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ABSTRACT

The document contains the third annual update of a longitudinal study on the implementation of P.L. 94-142, the Education for All Handicapped Children Act, by 16 local education agencies (LEAs). An introductory chapter outlines the content of the report and the study design. Section II describes implementation of P.L. 94-142 in 16 special education service delivery systems in terms of resources of and demands on the special education delivery system, legal pressure of court cases and due process hearings and procedures, status of interagency coordination, and changes in services and beneficiaries. A third chapter focuses on services at the elementary and secondary levels in the areas of prereferral screening and intervention; evaluation and reevaluation practices; individualized education program practices and parent involvement in decision making; the least restrictive environment; and personnel, roles, and inservice training. Program options, graduation requirements, and postsecondary opportunities are considered in Section IV. Among conclusions cited in a final section are that provision of mental health services remained an issue because no clarification has come from the Office of Special Education; that reevaluations every 3 years continued to be of low priority except in districts where external factors created pressure to attend to them; that the majority of LEAs targeted more resources to gaps at the secondary level than to any other level of the local special education service delivery system; and that school systems did not generally include postgraduation opportunities in their domain of concern. Appendixes present the study's conceptual framework and method of approach. (SB)

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LOCAL IMPLEMENTATION OF PL 94-142: Third Year Report of a Longitudinal Study

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November 1981

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FOREWORD

This study is one of a series supported by Special Education Programs (SEP) to describe the progress being made by local education agencies in implementing P.L. 94-142 and the challenges remaining. The information presented in this report was gathered during the 1980-1981 school year and illustrates the continued commitment and effort being made in our nation's schools to provide all handicapped children a free appropriate public education.

At the same time it is clear that there are remaining challenges in assuring that each handicapped child receives a free appropriate public education. This report suggests certain points where policies may be unclear, or where practices may deviate from the ideals set forth in the Act. These findings are consistent with those of the monitoring visits by SEP staff to each state participating in P.L. 94-142. Where such deviations have been found, SEP has worked with the states to clarify policies, has required that corrective actions be taken, and has required verification that prescribed corrective actions are made. In addition, SEP sponsors technical assistance activities to assist state and local administrators in appropriately serving all handicapped children.

It is our hope that the findings from this study will assist state and local education agency personnel in examining their own policies and procedures and in making any changes necessary to achieve the quality educational services for all handicapped students that are the promise of P.L. 94-142.

CONTENTS

FOREWORD iii

LIST OF EXHIBITS ix

KEY TO ACRONYMS xi

ACKNOWLEDGMENTS xiii

EXECUTIVE SUMMARY xv

I INTRODUCTION 1

Content of the Report 3
Design of the Study 5

II IMPLEMENTATION AT THE LEA LEVEL 9

Resources of and Demands on the Special Education Delivery System 9

State Education Agency Initiatives 10
Local Education Agency Allocation of Resources. 12
Summary 13

Legal Pressure of Court Cases and Due Process Hearings and Procedures 13

Court Cases 13
Due Process Hearings and Procedures 15
Summary 17

Status of Interagency Coordination 17

Court Cases 19
SEA Leadership and State Law 20
Level of Local Resources 22
Summary 23

Changes in Services and Beneficiaries 23

Initial Evaluation and Placement Backlogs 23
Reevaluation Backlogs 25
Overview of Changes in Services and Beneficiaries . . . 26
Status of Related Services 34

CONTENTS (continued)

Remaining Challenges for Local SEARS Delivery Systems 37
Summary 38

III MEETING NEEDS AT THE ELEMENTARY & SECONDARY SCHOOL LEVELS 41

Prereferral Screening and Intervention 41

Elementary School Level 41
Secondary School Level 44
Summary 45

Changes in Evaluation and Reevaluation Practices 45

Initial Evaluation Practice 45
Independent Educational Evaluation 49
Changes in Reevaluation Practices 51
Summary 52

IEP Practices and Parent Involvement in Decisionmaking . . . 53

Changes in IEP Practices 53
Parent Involvement in School-Level Decisionmaking . . . 60
Summary 61

Least Restrictive Environment 62

Changes in the Continuum of Placement Options 62
Changes in Mainstreaming Activities 66
Summary 71

Changes in Personnel, Roles, and Inservice Training 72

Changes in Personnel 72
The Boundary-Crosser Role 72
Other New Roles 75
Changes in Inservice Training 76
Summary 81

IV SECONDARY LEVEL: PROGRAM OPTIONS, GRADUATION REQUIREMENTS, POSTSECONDARY OPPORTUNITIES 83

High School Program Options 83
Vocational Education Program Options 85

CONTENTS (concluded)

Program Changes 85
Changes in the Coordination of Vocational Education Services 87
Match Between Student Skills and Local Job Market . . . 88
Remaining Challenges in Vocational Education for Special Education Students 90
Summary 92

Graduation Requirements and Minimal Competency Testing (MCT) 92

Influence of High School Graduation Requirements on Special Education Students 97
Effects of Minimal Competency Testing 99
Unresolved MCT Issues 106
Summary 107

Postsecondary Opportunities for Special Education Students 107

Continuing Education 109
Employment and Postsecondary Training Opportunities 110
Human Service Agency Services 113
Summary 117

V SUMMARY AND CONCLUSIONS 119

Overview of Progress in the 1980-81 School Year 120

Implementation at the LEA Level 120
Practices at the School Level 122
Secondary and Postsecondary Opportunities for Handicapped Individuals 125

Conclusions and Anticipated Changes 127

REFERENCES 131

APPENDICES

LIST OF EXHIBITS

Exhibit IV-1 - Vocational Technical Center: Example 1 93

Exhibit IV-2 - Vocational Technical Center: Example 2 95

Exhibit IV-3 - Example of How Funding Reduction Affects Service Delivery 115

KEY TO ACRONYMS

DMH	Department of Mental Health
DVR	Department of Vocational Rehabilitation
EMR	Educable mentally retarded
FAPE	Free, appropriate public education
HI	Hearing impaired
IEP	Individual education program
LEA	Local education agency
LRE	Least restrictive environment
MCT	Minimal competency testing
MIS	Management information system
OCR	Office of Civil Rights
OH	Orthopedically handicapped
OSE	Office of Special Education, U.S. Department of Education
OT	Occupational therapy
PT	Physical therapy
SEA	State education agency
SEARS	Special education and related services
SED	Seriously emotionally disturbed
SLD	Specific learning disability
SMR	Severely mentally retarded
TMR	Trainable mentally retarded
VI	Visually impaired

ACKNOWLEDGMENTS

In preparing this report, we were aided greatly by a number of individuals who reviewed various drafts and provided us with the benefit of their comments. This assistance was invaluable because it helped us to reorganize our presentation of findings in a more lucid manner.

For her helpful review, we are most grateful to Marian S. Stearns, Project Supervisor of this study. In addition to her keen insight and unique perspective in the conceptualization of the study, we appreciate deeply the freedom she gave us to prepare this document. We also thank James L. Deslonde, Program Manager, Sociology of Education, for his technical review of the draft report. We are also very grateful to our other SRI colleagues who supported us throughout the data collection, data analysis and reporting phases of this project. For their diligent field research and case study reporting, we thank John D. Cressey, Alexis A. Flippen, and Ellen Grogan Renneker. Their unique insights are reflected throughout this report.

Special thanks are due to Ronnie Hoffman, our OSE project officer, for her thoughtful review of the draft report and her constructive guidance regarding the final product. We look forward to concluding this project under her contract supervision.

Our gratitude must also be extended to the numerous individuals who provided us with in-depth information from the field. We are indebted to all of the SEA and LEA administrators, school principals, teachers, specialists, and community agency personnel who talked with us so willingly and openly about PL 94-142 implementation issues. Without such excellent cooperation and interest this report could not have been produced.

Finally, we are very grateful to the invaluable technical assistance provided by SRI staff persons who supported us through myriad drafts of each report section and who made the final draft into a finished product. These special people are Klaus Krause, Linda Burr, and Marion Collins.

EXECUTIVE SUMMARY

This is the third annual update report of findings from SRI International's longitudinal study of implementation of PL 94-142, the Education for All Handicapped Children Act, at the local education agency (LEA) level.* As part of its overall evaluation of progress in meeting the intent of the law, the Office of Special Education (OSE) contracted with SRI to conduct this multiyear study. The primary purpose of the study is to inform OSE and Congress about whether special education at the local level is changing in the way the Act intended and, to the extent possible, to explain why or why not. This study is designed as a set of multiple in-depth case studies of local school systems.

Last year, we described how LEAs were responding to the law's requirements during 1979-80. That report was based on interviews with a variety of respondents in 17 sites representing 9 states. This report presents the data collected during the third year, 1980-81, from 16 of the same local education agencies.**

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*LEAs are a diverse group of administrative units below the state level. In addition to local school districts, LEAs in our study include county school systems, intermediate units, and joint agreements or consortia among districts.

**There were 22 LEAs in the original sample. Budgetary constraints resulted in reduction of the sample size in Years 2 and 3.

In 1979-80, after 2 years of field data collection, we concluded that LEAs continued to make some progress in implementing the provisions of the law. New procedures were being incorporated into daily practice, which allowed professionals to begin to assess whether the procedures were accomplishing the purposes intended. Moreover, as procedures became routine, special education personnel had more time and energy for the delivery of services to handicapped children. However, we concluded that progress toward full implementation of the law--in the sense of its intent to have an individualized, child-driven system--continued to be constrained by three factors in the existing local special education service delivery system: inadequacy of available resources, limited knowledge and skills on the part of education personnel, and vague definitions of the borders of LEA legal and fiscal responsibility.

In view of these second-year findings, the third year of data collection focused on (1) how LEAs dealt with these factors in attempting to meet the full-service goal for their handicapped population and (2) whether within these 16 local service delivery systems, school personnel were better able than before to meet the intent of PL 94-142. In particular, we pursued in depth the "remaining challenges" associated with secondary-level programming for special education students. We looked at academic and vocational education opportunities provided by LEAs to help students prepare for the transition to the world of work, continuing education, postsecondary training, or services from other agencies. We here summarize the third-year findings, comparing them with the second year's, and we then draw general conclusions about differences between the two years.

Implementation at the LEA Level

In 1979-80, we found that in response to external pressures, emphasis in a majority of LEAs in the SRI study was placed on decreasing backlogs and waiting lists for services. Strategies used to reduce backlogs included hiring more evaluation personnel and expanding services. Although the reduction of backlogs for initial evaluation and placement remained a

priority this past year, backlogs existed in the majority of the sites, primarily at the evaluation stage. Adding evaluators was still the most common strategy used to tackle the backlog problem; fewer districts expanded services to accommodate more students. However, the continuing existence of backlogs is not surprising. Because of anticipated limits on or decreases in LEA resources, special education administrators, in general, attempted to maintain the status quo of their special education service delivery systems through minimal expansion.

During 1979-80, all LEAs in the sample used their available resources to expand services in one way or another. In the 1980-81 school year, with few exceptions, program expansion was more limited in scope. Simultaneous expansion at both the preschool and secondary levels occurred rarely. A few LEAs expanded or maintained their preschool programs (often with preschool incentive grants available under PL 94-142), but most districts focused their efforts on addressing program gaps at the secondary level, primarily in vocational education, specific learning disability (SLD), and seriously emotionally disturbed (SED) programs. Few changes were observed in the nature or quality of services to the following handicapped populations: 18- to 21-year-olds, severely handicapped, and children in private schools. Although related services increased slightly in half of the study sites, the changes can be characterized as "more of the same."

Overall, we did not observe any contraction of the delivery of special education and related services (SEARS) from the levels to which they have grown over the past 3 years. For the most part, however, LEA special education administrators were attempting to limit program expansion or to maintain the status quo within their local service delivery systems, in anticipation of federal and state cutbacks in funds for education.

This year, we found pervasive concern at the LEA level regarding the fate of PL 94-142 (rescission of the law was being discussed at the time of our site visits), as well as the possible weakening of federal and state mandates for a free, appropriate public education (FAPE) for handicapped children. The mood of fiscal conservatism under the Reagan

administration and related state developments were perceived as major constraints to district planning for future expansion in special education. Although LEA administrators continued to fill gaps in their local service delivery systems, they tended to approach change much more cautiously. In general, people worried more about all resources, not just PL 94-142, which remains an important but small percentage of their overall special education budgets.

During 1979-80, dimensions of the borders of LEAs' legal and fiscal responsibility to provide SEARS to all eligible children within their jurisdictions became clearer, as school districts experienced more questions surrounding related services. In some cases, the borders were clarified by court cases, OSE monitoring, or a change in state policy. Despite some concern last year over the 12-month schooling issue raised by Armstrong v. Kline, few LEAs saw this as a demand on them this year.

However, one issue of direct concern to most LEAs in the study--the provision of mental health services (psychotherapy, psychological and psychiatric counseling)--remained an issue in 1980-81, because no clarification has come from OSE. The majority of study sites continued to draw the line of their responsibility at their traditional medical/educational border (e.g., that psychotherapy is a medical, not an educational service).

Education agency responsibility for related services also remained a problematic issue in the area of interagency coordination because of (1) the general supervision clause of PL 94-142, (2) the law's requirement that related services be provided to handicapped children at no cost to their parents, and (3) the political and financial realities of how state human service delivery systems function on a day-to-day basis. Although some states in the SRI study made progress in implementing interagency agreements, there continued to be wide variation in the extent to which integration of services to the handicapped had been accomplished by the 1980-81 school year. In addition to the continuing need to review and revise conflicting laws and regulations pertaining to cooperative service

arrangements, SEAs and LEAs must commit resources to bring about interagency cooperation. Adequate incentives must exist for education and other human service agencies to cooperate; currently, incentives vary depending on local and state-level circumstances.

Court cases continued to influence various aspects of local special education service delivery systems, although due process hearing activity continued to decline this past year. Unlike court cases, due process hearing decisions per se do not generally produce programmatic or systematic changes in LEA policy. For the most part, informal resolution of parent complaints through various complaint procedures has increased over the past 3 years.

Practices at the School Level

During 1979-80, we observed that the procedural requirements of PL 94-142 had been refined and had been incorporated as routine practices. Most administrative procedures (the individual education program [IEP] process in particular) were a generally accepted part of the job, and the majority of the LEAs viewed them as less difficult to perform than in the first year (1978-79).

In 1980-81, we saw little change in school-level practices. Techniques designed to increase the appropriateness of referrals to special education (i.e., intervention prior to formal referral to special education) continued to be used. In general, we did not find a greater emphasis on prereferral screening and intervention, but a few LEAs showed systematic increases in this area, in response to changes in state regulations and, in one case, as part of district planning. As reported last year, professional staffs in sites using prereferral intervention techniques believe that such techniques increase the appropriateness of formal referrals to special education.

Although the pattern of increasing multidisciplinary evaluation and individualized assessment practices continued this past year, the evaluation picture shifted slightly at both the elementary and secondary levels. That

is, the changes demanded by external factors (e.g., state regulations and monitoring, OSE monitoring) seemed to be directed toward refinement, rather than restructuring, of the system. For the most part, the changes demanded by previous court cases (e.g., Mattie T. v. Holladay and Larry P. v. Riles) have already been made. Although we found this year that most LEAs provided information to parents concerning their right to an independent educational evaluation at public expense if they disagree with an LEA evaluation, parents rarely used this option. However, LEA evaluation teams did tend to give consideration to the few parent-initiated independent education evaluations they received. Reevaluations every 3 years continued to be of low priority, except in districts where external factors (court cases, monitoring) created pressure to attend to them.

In determining children's services on the basis of individual needs, school personnel remained constrained by what services were currently available. Given limited program expansion and change in the continuum of program options, professional staffs could rarely consider services not already available through their individual districts when making decisions about children's services. Although parent involvement in school-level decisionmaking is now considered a routine part of the evaluation and placement process, parents' input remained primarily nonsubstantive in nature.

We did observe major changes in IEP practices in the study sites, related both to the time when short-term objectives are written (i.e., before rather than after placement) and to the nature of the objectives. The pattern in the majority of the LEAs was to write broader short-term objectives. In effect, this practice made IEPs less like instructional plans, so that they reflected the intent of OSE's recent interpretation of the IEP requirement.

In general, there was little expansion in the continuum of placement options available to handicapped students, and a wider continuum of options continued to exist for mildly handicapped students (primarily SLD and educable mentally retarded [EMR] than for the more severely handicapped

(e.g., trainable mentally retarded [TMR] and severely mentally retarded [SMR]). Although we saw no major change this year in the amount of mainstreaming of special education students, we did find that new strategies to facilitate mainstreaming continued to be developed. We found generally that regular teachers continued to accept their expanded role vis-a-vis special education students, thus making mainstreaming easier to accomplish.

Given limited program expansion in 1980-81, there were few additions of instructional personnel. Even though LEAs sought to maintain the status quo, the existing work force was required to take on additional responsibilities or workloads to try to maintain appropriate programming for handicapped children.

In 1978-79, we identified boundaries, particularly the boundary between special education and regular education, as a source of problems for implementation of PL 94-142. This was especially true in areas that required some type of coordination in such activities as mainstreaming and IEP development and use. We found that the personnel whose role is to facilitate such coordination, whom we called "boundary crossers," had a significant effect in minimizing barriers to implementation. Where boundary crossers had existed previously, in 1980-81, they continued in their primary function of bridging the organizational barriers between regular and special education personnel. This year, we found an increase in the number of boundary-crossing personnel, primarily because of increased coordination between the special education and vocational education systems at the secondary level.

Efforts to increase the knowledge and skills of regular and special education personnel through inservice training changed little in 1980-81. As has been the case in past years, both regular and special education personnel need more substantive training regarding working with handicapped students, as do regular education teachers who work with slow learners in the regular classroom environment. Overall, inservice training remained a low priority at both the LEA and SEA levels.

Secondary and Postsecondary Opportunities for Handicapped Individuals

In 1979-80, we found that although a wide range of high school program options existed across the LEAs, rarely did a comprehensive range of options exist within a given LEA. A handicapped student's program options were determined largely by what was available within a district, and varied substantially across sites. Although our findings this year are consistent with those of last year, we obtained more in-depth knowledge of the goals and opportunities for secondary students. In general, LEAs in this study believe that their high school programs should prepare special education students for continuing education, postsecondary training, or employment. The employability goal is strongest for EMR and more severely handicapped students. Overall, more program options exist for the upper range of handicapped students, primarily SLD, higher functioning EMR, and SED students with socially appropriate behavior.

Despite budgetary constraints, the majority of LEAs in the study targeted more resources to service gaps at the secondary level than to any other level of the local special education service delivery system. In particular, efforts were made to improve SLD, SED, and vocational education programs and services. Factors influencing this trend included: (1) more students who had been identified as handicapped at the elementary level were now reaching the secondary schools, and (2) declining enrollment in the regular education population meant that vocational program staff and others had time to devote to the special education population.

The majority of LEAs addressed vocational education programmatic gaps in 1980-81. While some districts expanded programs, others focused their efforts on creating new roles, or modifying roles or procedures, to better coordinate vocational education services for special education students. We observed new, collaborative efforts between the vocational education and special education systems; such cooperation is a significant factor in providing handicapped students with access to greater vocational and technical training opportunities. Despite LEA efforts to improve the components of their vocational education service delivery systems, however, all system

components rarely linked together smoothly. The transition of handicapped students from school to work is often difficult. Unmet needs existed in such areas as vocational assessment, career counseling, curriculum and equipment modification, and job placement services.

When we looked at the effects of minimal competency testing (MCT) on special education student programming this year, we found that many issues remained unresolved in the development and implementation of MCT programs. Where such tests were used for graduation requirements, they presented particular concerns for the handicapped student population. MCT programs require educators to reconsider the significance of the high school diploma and the validity of tests in setting educational competency standards defined as minimal. Major MCT policy issues affecting special education students include: exclusion or inclusion of specific handicapped populations in MCT programs, development and accessibility of appropriate tests, and alternative (differential) graduation standards.

This year, for the first time in this study, we inquired about goals and programs for the 18- to 21-year-old handicapped population and explored the actual postsecondary options for these special education students when they graduated or left school. We found that school systems did not generally include postgraduation opportunities in their domain of concern, nor did any other agency think in terms of age-defined groups. Rather, these students fell into one or more of four options after high school: continuing education (e.g., college, adult education); employment or further vocational training; clients of caretaking or other human service agencies (e.g., welfare, group homes); or "other" (e.g., military service, at home, corrections system, "on the street"). Again, the degree of self-sufficiency or independent living that they attained depended not only on their capabilities and preparation, but also on the social institutions and other local resources for handicapped people.

Postsecondary opportunities for special education students varied considerably across districts. As is the case while in school, the mildly handicapped (high functioning SLD and mild SED) and the motor and sensory

handicapped had the most opportunities open to them in the postsecondary world. For more severely handicapped (e.g., low functioning EMR, TMR, SMR), there were generally some caretaking services available, but these service agencies also felt threatened by funding cutbacks. Because low functioning SLD and EMR students often fail to meet agency eligibility criteria for these services, and because few suitable programs exist for them, they may be least well matched with needed social services.

Conclusions and Anticipated Changes

During the third year of this study, we collected data in 16 of the original 22 sites. On the basis of the data, we conclude that LEAs continue to progress in implementing PL 94-142. In contrast to last year, the law's requirements per se seemed to have less influence on LEA special education administrative decisionmaking than did other external factors (e.g., court cases, policy changes, SEA regulations) and internal factors intrinsic to individual service delivery systems. For example, even when LEAs took corrective action in response to monitoring (e.g., making IEP objectives less like instructional plans), they made additional adaptations consistent with the context of their local systems.

District continue to move toward the full-service goal of PL 94-142 by addressing special education program gaps, particularly at the secondary level. However, they remain constrained by the three problem areas of inadequate resources, limited knowledge and skills of education personnel, and the vague definitions of the borders of LEA legal and fiscal responsibility. In 1979-80, we noted that LEAs were becoming more aware of the dimensions of the constraints under which they must operate and the extent to which they have control over them. As these dimensions became clearer, LEAs were better able to focus their limited resources on solutions to local SEARS problems. In 1980-81, these dimensions became less clear because of anticipated federal and state cutbacks in support to special education. As a result, LEA administrators were concerned about the future of service delivery to handicapped children.

Although it should be noted that we visited the study sites at a time of great uncertainty about federal funding levels and thus heard fears of the worst possible scenarios, it seems clear that LEA administrators will be faced with future cutbacks and should plan conservatively. PL 94-142 will remain a categorical federal aid program for at least 1 to 3 years, after recently being excluded from the Reagan administration's block grant legislation for federal education programs; however, the entire federal role in education is being fundamentally reassessed. PL 94-142 funds will remain targeted to handicapped children in the short term, thus avoiding competition for dollars among the targeted population groups (i.e., Title I disadvantaged, the handicapped), but the federal funding role is expected to diminish within the next few years.

We have suggested previously that local staff need OSE's assistance in clarifying their borders of responsibility. However, the issue remains this year that unless LEAs draw their own borders of legal and fiscal responsibility for SEARS, it is unclear at which level--federal, state, or local--such clarification will occur. When the impending changes in PL 94-142 regulations become known, it should be apparent at which level such decisions most appropriately should be made. Clarification in this area should also contribute to the resolution of problems that still remain in the area of interagency coordination of related services at the state level.

Given impending changes in the locus of educational decisionmaking, we conclude that OSE should consider focusing its technical assistance efforts on assistance designed to enhance local capacity to adapt to the realities of fiscal conservatism. Some of the creative strategies we observed this year (described in Sections II, III, and IV), might be helpful to many LEA administrators struggling with major planning decisions.

I INTRODUCTION

This is the third annual update report of findings from SRI International's longitudinal study of implementation of PL 94-142, the Education for All Handicapped Children Act, at the local education agency (LEA) level.* As part of its overall evaluation of progress in meeting the intent of the law, the Office of Special Education (OSE) contracted with SRI to conduct this multi-year study. The primary purpose of the study is to inform OSE and Congress about whether special education at the local level is changing in the way the Act intended and, to the extent possible, to explain why or why not. This study is designed as a set of multiple in-depth case studies of local school systems.

Last year, we described how LEAs were responding to the law's requirements during 1979-80. That report was based on interviews with a variety of respondents in 17 sites representing 9 states. This report presents the data collected during the third year, 1980-81, from 16 of the same local education agencies.**

The main finding from the second year of the study was that LEAs continued to make progress in implementing PL 94-142. The new procedures were being incorporated into daily practice, which allowed professionals

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*LEAs are a diverse group of administrative units below the state level. In addition to local school districts, LEAs in our study include county school systems, intermediate units, and joint agreements or consortia among districts.

**There were 22 LEAs in the original sample. Budgetary constraints resulted in reduction of the sample size in Years 2 and 3.

to begin to assess whether the procedures were accomplishing the purpose intended. Moreover, as procedures became routine, special education personnel had more time and energy for the delivery of services to handicapped children. However, we concluded that progress toward full implementation of the law (in its intent to have an individualized, child-driven system) continued to be constrained by three main characteristics of the local special education service delivery system: inadequacy of available resources, limited knowledge and skills on the part of education personnel, and vague definition of the borders of LEA legal and fiscal responsibility.

During the third year of data collection, therefore, we focused generally on (1) how LEAs dealt with these constraining factors in attempting to meet the full-service goal for their handicapped population and (2) whether, within the 16 local service delivery systems studied, school personnel were better able to meet the intent of PL 94-142 than previously. And in particular, we focused on the "remaining challenges" associated with secondary-level programming for special education students, as well as postsecondary opportunities for them.

In 1979-80, we noted that LEAs were becoming more aware of the dimensions of the constraints under which they must operate and the extent to which they have control over them. As the dimensions became clearer, LEAs were better able to focus their limited resources on solutions to local special education and related services (SEARS) problems. In 1980-81, these dimensions became less clear, primarily because of the pervasive concern at the LEA level regarding the fate of PL 94-142 (rescission of the law was being discussed at the time of our site visits), as well as the possible weakening of federal and state mandates for a free, appropriate public education (FAPE) for handicapped children.

Overall, we did not observe any contraction of the delivery of special education and related services from the levels to which they have grown over the past 3 years. For the most part, however, LEA special education

administrators were attempting to limit program expansion or to maintain the status quo within their local service delivery systems, in anticipation of federal and state cutbacks in educational funds. The mood of fiscal conservatism under the Reagan administration and related state developments were perceived as major constraints to district planning for future expansion in special education. Although LEA administrators continued to fill gaps in their service delivery systems, they tended to approach change much more cautiously than before. In general, people worried more about all resources, not just PL 94-142, which remains an important but small percentage of their overall special education budgets.

Inquiring about goals and programs for the 18- to 21-year-old handicapped population, we found that postsecondary opportunities for special education students varied considerably across districts. As is the case while in school, the mildly handicapped population has the most opportunities open to them in the postsecondary world. For the more severely handicapped, there are generally some caretaking services available, but these service agencies also feel threatened by funding cutbacks.

Content of the Report

The third year's findings are presented in the following three sections. The first findings section (II) examines changes in implementation at the LEA level. The first subsection of Section II describes the resources of and demands on the local service delivery system as LEAs confront increasing fiscal conservatism. The next two subsections consider the nature of legal pressures on local school districts in 1980-81 and the status of interagency coordination to provide services to handicapped children. The last subsection examines how districts are handling evaluation and placement backlogs and the limited extent to which they are expanding special education and related services.

Section III presents the findings on how the needs of individual students are being met at the elementary and secondary levels. Last year's findings indicated that LEAs still had much to accomplish in meeting the intent of the law in terms of individualization. Section III describes the progress in this area during 1980-81. We first describe the use of pre-referral screening strategies designed to intervene before children are formally referred for special education, as well as to provide "high-risk" children with supportive services in the regular classroom. We then present findings about procedures from evaluation to placement, including evaluation/reevaluation procedures, individual education program (IEP) practices, and parent involvement in decisionmaking. In the fourth subsection, we consider how the concepts of "least restrictive environment" (LRE) and mainstreaming are giving impetus to changes in the continuum of program options and the coordination of services between regular and special education. Finally, we describe changes in personnel roles (including the boundary-crosser role) designed to coordinate services for special education students, and we update the status of inservice training for school personnel.

Secondary-level programs, graduation requirements, and postsecondary opportunities for handicapped students are discussed in Section IV. First, we describe changes in high school program options, with particular emphasis on vocational education opportunities. We then present our findings about the effects of graduation requirements and minimal competency testing on handicapped students. In the final subsection of Section IV, we discuss the transition of special education students from high school to the post-secondary world.

The intent of Sections II, III, and IV is to compare the findings from the third year with those from the second year wherever possible, so that conclusions can be drawn about changes and movement toward meeting the full intent of the law. These sections also highlight examples of strategies that various districts are using in their implementation efforts.

Finally, Section V presents a summary and conclusions. We first present an overview of the progress we observed during the 1980-81 school year, then discuss anticipated changes in the context of a changing federal role in education.

Design of the Study

The design of the third-year study was based on the conceptual framework and method of approach developed during the first year and described in the first-year report (see Appendices A and B).* Our basic data collection strategy is to conduct interviews in the study sites twice each school year for a period of several days. This year, however, budgetary constraints resulted in our visiting the sites only once, in February and March 1981. Interviews were conducted at both the school and district levels. Respondents included special education administrators, principals, special education teachers, psychologists, vocational education personnel, and representatives of human service agencies.

Our original site selection procedure (including the selective elimination of some sites from the study in Years 2 and 3) was designed to provide maximum variation among LEAs in the study on the factors most likely to explain differences in local implementation of the law. These factors include: different state special education laws and funding formulas, different special education administrative structures, availability of local resources (i.e., amount of local funding, facilities, qualified staff, administrative leadership, and community involvement), and accessibility of resources (i.e., geographic size and population dispersal). The sites included in the third year were:

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* M. S. Stearns, D. Greene, J. L. David, Local Implementation of PL 94-142: First Year Report of a Longitudinal Study. SRI International, Menlo Park, California, April 1980.

- California
  - Butte County Consortium
  - Fresno Unified School District
  - San Diego Unified School District
- Florida
  - Hillsborough County Schools
- Illinois
  - Lee County Joint Agreement
  - Northern Suburban Special Education District
- Mississippi
  - Pascagoula Municipal Separate School District
- Oklahoma
  - Guthrie Independent School District
  - Tulsa Independent School District
- Pennsylvania
  - Philadelphia Intermediate Unit #26
- Rhode Island
  - Coventry School District
  - Woonsocket School District
- Tennessee
  - Campbell County School System
  - Memphis City School System
  - Metropolitan Nashville Public Schools
- Washington
  - Edmonds School District

The findings presented in this report are derived from a cross-site analysis of the 1980-81 case study data. Our analysis of findings across the 16 case studies permits us to extend inferences about what explains progress or lack of progress to sites beyond those in our sample. That is, when we provide a reason or explanation for how or why something is being

done, we are reasonably certain that the relationship is applicable to LEAs in general across the country. In contrast, when we report how frequently we observed some event or activity (e.g., the majority of the LEAs addressed vocational education programmatic gaps; most LEAs seemed to be filling service gaps), our claims about prevalence are explicitly limited to the 16 LEAs we actually visited. A study of this type cannot support any inference or extrapolation about prevalence to the nation as a whole.

II IMPLEMENTATION AT THE LEA LEVEL

This section describes the progress of the implementation of PL 94-142 as observed in the 16 special education service delivery systems visited during the 1980-81 school year. We first discuss local education agency resources, demands on the service delivery system, and the ways that various factors (i.e., local and outside influences) affected the allocation of special education resources. Next, we discuss legal pressures on LEAs, including court cases and due process hearings. We then describe the status of interagency coordination, including an update on legal and fiscal responsibility for the provision of SEARS to handicapped children. Finally, we describe the changes (compared with the 1979-80 school year) in backlogs of the service delivery system, as well as changes in the provision of special education and related services to beneficiaries within the jurisdictions of LEAs. In particular, the focus is on describing the nature of program expansion by age range, handicapping condition, and services to nonpublic schools.

Resources of and Demands on Local Special Education Delivery Systems

With few exceptions, we found that LEA special education administrators were more concerned this past year than in 1979-80 about local and external factors that may greatly inhibit their future ability to move toward PL 94-142's full-service goal. For example, because of the sudden fiscal conservatism of the local school board, one LEA special education director planned no expansion of special education services. The board denied approval of the director's request to pursue state grant monies to identify borderline children with a specific learning disability (SLD). According to a board member, special education is "big enough."

Although local support for special education was of concern, the pervasive concern across the study sites was anticipated cutbacks in federal and state support to education under the influence of the conservative Reagan administration. A sense of uncertainty about funding levels prevailed and made it very difficult for LEA administrators to plan for the coming year. As one local administrator commented:

> Funding insecurity is a major constraint.... We're in a holding pattern for the next 3 years, with little or no new programs expected.

State Education Agency Initiatives

The general tone in at least seven of the nine states in the study was that "special education cannot serve everyone." The other two states are in areas of rapid economic growth (the Sunbelt) so that their resources are not yet an obstacle to program expansion. If federal and state mandates for a free, appropriate public education for handicapped children weaken, local administrators anticipate that the mildly handicapped population will suffer as federal and state resources are targeted to the more severely handicapped.

During our 1980-81 site visits, we found evidence that some states have already limited, or were planning to limit, their support for special education. Under new regulations guiding California's Master Plan for Special Education implementation, a 10% cap (down from 11%) was imposed on the number of special education students that can be counted for state reimbursement purposes. The maximum proportions for specific instructional service categories were also designated. The state education agency (SEA) also tightened somewhat the eligibility criteria for the learning handicapped population.* The impact on two of the study sites in this state was evident in 1980-81. One LEA already had reached the funding maximum for

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*Under the California Education Code, learning handicapped students are those with significant disabilities in learning or behavior, such as learning disabilities, behavior disorders, and educational retardation.

self-contained classes, yet had many children waiting for such placements. The LEA special education director had already asked for a waiver to transfer related services money to pay for additional self-contained classes. The other district decertified some resource room children and returned them to the regular classroom with supportive services.

In Tennessee, state sales and property tax revenues did not reach the amount expected for this year, so state special education support was cut by $18 million statewide. An SEA task force developed proposed regulations to make the state law (Chapter 839) more consistent with PL 94-142 mandates. These proposed regulations would delete the following categories from state law: learning problems, socially maladjusted, intellectually gifted, and pregnant minors. The proposed regulations also call for tightening of SLD eligibility criteria by using stanine scores to define the required discrepancy between achievement and ability.

Pennsylvania's SEA proposed a new special education funding model in an effort to "level off" state support for special education. The current open-ended, excess-cost model concerns legislators because "everyone wants to see the end of the road here." The proposed funding model was designed to reduce state funding of special education by placing a limit on the number of handicapped children for which LEAs would receive reimbursement. Although the model was dropped after a series of statewide hearings, the state education secretary commented:

> I'm convinced that the issues that have been raised are important ones. I'm also convinced that changes must be made in the way we fund special education in Pennsylvania, and in how we control the cost and how we deal with court mandates.*

Finally, in March 1981, in anticipation of impending federal cutbacks in PL 94-142 funding levels, the Illinois SEA required LEAs to cut their 1981-82 applications for PL 94-142 entitlement grants by 25%. In addition,

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* Education of the Handicapped, June 3, 1981.

a bill to "demandate" the Illinois special education law was introduced into the state legislature. Although the bill failed to pass by one vote, a local superintendent expressed concern that "...the climate of fiscal conservatism created in Washington under Reagan has been imported to state capitols."

Local Education Agency Allocation of Resources

Despite such SEA initiatives and LEA administrators' concerns regarding anticipated federal and state funding cutbacks, the additions to special education service delivery over the past 3 years were not reduced greatly in the 1980-81 school year. However, it appeared that the rate of growth slowed as the services provided to handicapped children expanded only minimally. Only two sites in Sunbelt states had special education service delivery systems that continued to grow at a rapid pace.

Factors related to changes in LEAs' special education service delivery systems and their capacity to meet the individual needs of handicapped children are discussed throughout this section and in other sections of this report. Such factors include:

- PL 94-142.
- Changes in state legislation and/or regulations.
- Budgetary constraints.
- New service demands (e.g., extended school year, private schools, deinstitutionalization).
- Declining enrollment.
- Legal/advocacy pressure (i.e., due process hearings, court cases).

Summary

The most significant of our findings during the 1980-81 school year regarding the resources of and demands on the special education delivery system are the following:

- The major concern of district special education administrators was anticipated cutbacks in federal and state support to education. Uncertainty regarding funding levels has made it very difficult for LEA administrators to plan for 1981-82. They fear that current fiscal conservatism may greatly inhibit their future ability to move toward PL 94-142's full-service goal.
- Some states have already limited or are planning to limit their support for special education through various means--placing limitations on the number of the handicapped children who can be counted for reimbursement purposes, tightening eligibility criteria, dropping some special education disability categories, and establishing new funding models.
- Local administrators anticipate that the mildly handicapped population will suffer as support to special education weakens because resources will be targeted to the severely impaired. Despite these concerns, no overall contraction in SEARS delivery has occurred this year in the study sites.

Legal Pressure of Court Cases and Due Process Hearings and Procedures

Court Cases

Court cases related to specific issues affecting special education are generally discussed where relevant in other sections of this report. For example, court cases related to the issue of minimal competency testing are mentioned in Section IV. However, the cases related to the 12-month schooling issue are discussed here. Following this discussion, we describe changes in due process hearings and procedures.

In 1979-80, Pennsylvania's Armstrong v. Kline decision caused some concern in other states, but no trend toward an extended school year (i.e.,

12-month schooling for handicapped students) was apparent in the sites participating in our study.* The Pennsylvania State Department of Education appealed the 12-month schooling case to the U.S. Supreme Court, saying that the ruling would hurt its budget and local control of education.** On June 22, 1981, the U.S. Supreme Court refused to review the case, now referred to as Scanlon v. Battle. Thus, Pennsylvania must find the money to keep its schools open to severely handicapped children on a year-round basis. Since 1979, the state has provided summer schooling for more than 2,000 disabled students at a cost of more than $1 million per summer.***

The Philadelphia School District implemented the Armstrong v. Kline decision in Summer 1980. The Education Law Center assisted the LEA in its implementation efforts, and there was general agreement that the program had been a success. The individuals we talked with reported that approximately 300 severely handicapped students were identified and served. Although the SEA funded the program in 1980, funding for Summer 1981 was still in question at the local level.

The provision of an extended school year was at issue in one other state this year. In Mississippi, the Crawford v. Pittman decision required the state to provide 12-month services to several severely handicapped students. However, at the time of our visit, no impact was seen at the local level because an SEA policy had not been issued.

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*On June 21, 1979, the U.S. District Court for the Eastern District of Pennsylvania ruled that the state's blanket refusal to provide 12-month education services violated PL 94-142. That is, the court held that, under federal law, each handicapped child in the Commonwealth is entitled to receive a "free appropriate public education" and recognized that, to have meaningful access to public education, handicapped students may require a continuous program of SEARS in excess of the normal 180-day school year.

**Education Daily, June 18, 1981.

***Education of the Handicapped, July 1, 1981.

For the most part, the 12-month schooling issue was mentioned as a concern in about one-third of the study sites. Only in one LEA was the summer school issue the subject of a due process hearing this past year; however, the LEA won the hearing and did not have to provide summer school services. In another LEA where summer school had been an issue in due process hearings in the past, there was continued pressure from some parents. However, because the district had won the hearings previously, LEA administrators were not greatly concerned and indicated that most parents did not seem to be pushing very hard for 12-month schooling.

In summary, it appeared that various local administrators were aware of the national attention that 12-month schooling has received. Nevertheless, demand for this service is not strong in most of the LEAs participating in the longitudinal study.

Due Process Hearings and Procedures

Due process hearing activity can be characterized as minimal in all the study sites this year. Half of the LEAs had from one to three hearings; half had none. Over the past 3 years, we have observed a gradual decline in due process hearing activity. For the most part, LEAs have tended to win hearings. As one local superintendent reflected on the change in due process activity (the district initiated both due process hearings this year), he commented that parents no longer seem interested in going through the hearing process any longer. He thought that perhaps this was because parents perceive that "it's a losing game--they lose because they're wrong or because we have an edge with lawyers."

As was true last year, due process hearings generally were over the issues of private school placement and related services. In the one LEA that experienced its first due process hearing this year, parents objected to the district's recommendation that their child be served in a trainable mentally retarded classroom within the LEA, rather than in a costly private

hospital where he had been served previously. Although the case was unresolved at the time of our visit, the LEA special education director was concerned that losing this case might upset the calm school-community relationship that has existed for the past 3 years: "The school board will go crazy if we have to pay." A due process hearing in another district involved a different issue. Parents wanted to specify the amount of related services and the specific form of service delivery for their autistic child. The LEA was able to establish that it was providing appropriate SEARS for this child and won the hearing.

As we reported in 1979-80, the resolution of complaints without a due process hearing depended on a variety of local factors, such as the presence of parent advocates and availability of mediation as a prior alternative. In particular, the past history and general tone of parent-school relationships in a district, as well as the desire and capacity of individual LEA personnel to use informal dispute resolution procedures, were factors that appeared to be influential in all districts. Dispute resolution strategies, such as negotiation and prehearing conferences, were also found to be effective by LEA personnel in some of the study sites last year.

In at least one district, complaint procedures were created in 1980-81 so that parents could present their complaints to an executive committee of the school board. Another LEA established a "data review committee" this year. The committee, consisting of administrative-level personnel, review cases of special education students for whom a change in placement in being recommended (e.g., by school-level personnel placement committees, teachers, or parents). Because parents were able to ask for a review of placement or services through the committee, the effect was to reduce due process activity in this district.

The significant decrease in due process hearings in one LEA was attributable largely to the success of a school-based parent outreach program that the LEA initiated in 1979-80. As the LEA special education

director stated, "I attribute a lot of this decrease to the parent facilitators--the administration is getting fewer phone calls from irate parents."

It continues to be true that due process hearing decisions per se do not generally produce programmatic or systematic changes in LEA policy, but they have caused some LEAs to focus more attention on programmatic gaps within their SEARS delivery systems. Court cases are much more likely than due process hearings to affect LEA policy and resource allocation, as described later under changes in services and beneficiaries.

Summary

To summarize, the findings from the 1980-81 examination of legal pressures affecting special education in the study sites were the following:

- Despite the national attention given to the 12-month schooling issue as a result of the Armstrong v. Kline court case, the demand for this service was not strong in most of the longitudinal study sites.
- Minimal due process hearing activity occurred this year, reflecting a gradual decline in hearing activities over the past 3 years. The most frequent topic of hearings continues to be the issues of private school placement and related services.
- For the most part, LEAs continue to rely on informal dispute resolution strategies to resolve parent demands (e.g., parent facilitator program, data review committee).
- Due process hearing decisions per se do not generally produce programmatic or systematic changes in LEA policy, although they have caused some LEAs to focus more attention on programmatic gaps. Court cases have more significantly affected LEA policy and resource allocation.

Status of Interagency Coordination

An issue that persists in the area of interagency coordination is the problem of education agency responsibility for related services created by:

(1) the "general supervision" clause of PL 94-142, (2) the Act's requirement to provide related services to handicapped children at no cost to their parents, and (3) the political and financial realities of how state human service delivery systems function on a day-to-day basis.*

Under the general supervision clause (Section 300a.600 of the final regulations), PL 94-142 requires that SEAs be responsible only for ensuring that related services are provided to special education students, and it is presumed that other human service agencies will acknowledge shared responsibility for the provision of these services. But, as we reported last year, other agencies in our study sites are responsible for only limited and fragmented services, and none has a universal obligation to provide services to all handicapped students who need them. This year, the problem still remains: under PL 94-142 the agencies held accountable if services are not provided are the LEA and, ultimately, the SEA.

Although states have been making progress in implementing interagency agreements, there continues to be wide variation in the extent to which human services to the handicapped have been effectively integrated. The nine states in our study are in various stages of development with regard to interagency cooperation. For example, in one state the SEA has worked proactively with other human service agencies to change legislation and regulations to promote the integration of services for the special education population. At the other end of the continuum is a state that recently negotiated written interagency agreements that have had little or no impact on cooperation because the agencies have not been committed to the need for change. Between these two extremes are states that recently have begun to negotiate agreements between agencies that have resulted in increased interagency cooperation.

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* A more thorough discussion of this problem is contained in an SRI paper entitled "Local Implementation of PL 94-142: Education Agency Responsibility for 'Related Services,'" by David Greene (November 15, 1980).

Although we can track states' progress related to interagency collaboration, it is not possible to make general statements regarding the reasons for progress or the lack of progress by states and LEAs. Issues arise that affect agency relationships in inconsistent ways (i.e., the same factor can have different impacts depending on the state of development of interagency agreements at the SEA or LEA level). As we have reported in past years, progress in implementing interagency coordination reflects each state's existing political and financial realities concerning the delivery of human and social services. In some instances, state laws and regulations create strong disincentives for cross-agency coordination.

This year, we observed three factors that appeared to influence the level of interagency coordination: court cases, SEA leadership and state laws, and the level of resources within an LEA. The influences of these factors are discussed below.

Court Cases

In two of the states in our study, court cases have involved interagency coordination issues, but with very different results. In Illinois, a state that has a moderately developed level of interagency cooperation, a class action suit was filed by the Office of Civil Rights (OCR) in February 1980 over the issue of fiscal liability for the full costs of educating handicapped children in private residential placements. Because parents had to pay the difference between allowable state rates and the actual costs of serving handicapped children in these facilities, OCR charged the state with failing to provide a free, appropriate public education (FAPE) to many handicapped children. This case induced the state to make changes in state law during 1980; these changes have affected interagency coordination. The state agencies responsible for payment for services to special education students in private residential facilities issued a memorandum of understanding in August 1980 detailing responsibility for the relative liability of each agency in cooperative placements, and the state passed emergency regulations to provide the administrative means of

carrying out the agreement between the Department of Mental Health (DMH) and the SEA. Although the changes at the state level had not been in place long enough to have had any long-range results, the reaction of local special education administrators interviewed this year was positive. As one superintendent stated, "Agency people know that they have to respond to LEAs. There's less frustration at the interface level and better communication."

The Mattie T. v. Holladay court case in Mississippi, which has very little formal interagency cooperation, required that the SEA take a more active role in ensuring an appropriate education for the state's special education population. One result of the consent decree was that interagency agreements had to be drawn up among all agencies serving the handicapped. Although 2 years have passed since these agreements were drafted, interagency cooperation has improved little. Because the interagency agreements did not clearly determine funding responsibility for services, the SEA can provide little assistance when LEAs have problems working out arrangements with local service agencies. The SEA can only try to find alternative services for LEAs at the same price, because the SEA has no regulatory authority ("clout") over the other agencies.

SEA Leadership and State Law

Important elements in facilitating the integration of services to the handicapped are the level of SEA leadership vis-a-vis LEAs (e.g., state-level agreements, technical assistance) and the provisions of the state law. For example, one state's tradition of close cooperation between the SEA and LEAs has facilitated the integration of services to the handicapped. The SEA has provided technical assistance on issues such as deinstitutionalization (through the establishment of joint SEA-DMH and LEA-DMH task forces to work out the problems involved) and the clarification of LEA legal responsibility for related services (through policy statements on psychotherapy). In addition, the organization of human service agencies

under a centralized authority makes it easier to negotiate agreements among agencies.

In contrast, another state in our study has avoided policy promulgation because the SEA has adopted the philosophy that the key to change is local ownership. Although some people argue that this philosophy holds great merit, the LEAs in the state cite this laissez-faire attitude as the source of many of their problems in determining responsibility for providing related services to special education students. Communication is poor between the SEA and the districts in our study; and when the LEAs have taken the initiative in setting local special education policy, they have received no assurances of support from the SEA. Also, the lack of SEA leadership and unclear state interagency agreements have provided LEAs with little leverage over other service agencies. In some cases, the LEAs have been put in a legal bind when the state has issued recommendations that are contradictory with local practices. For example, one LEA is suing the SEA as a result of such an incident during 1980-81. Without clear guidelines from the state on the issue of what is to be considered a medical vs. educational related service, this LEA drew its own border of responsibility in this area. The LEA's decision was challenged by a parent, who wanted a behavioral therapist to provide therapeutic services in the child's home after school hours in addition to the services already provided during the school day. The district refused to provide the services, but the due process hearing decision from the state directed the LEA to provide this additional related service. Because it disagrees, the LEA is suing the SEA in order to appeal the due process decision. As a result of this court action, the SEA may be forced to establish some clear guidelines on what constitutes a related service.

As reported last year, state law in one of our states has created a problem over providing services that fall on the medical/educational border. At issue was the expenditure of education dollars for medical "treatment" services, a procedure that is prohibited by state law. For example, if it was determined by the LEA that a special education student needed psychiatric therapy, the district could not recommend such services

in the IEP because this would require the LEA to seek DMH services for which a fee is charged. However, the payment of this fee by the LEA would have been contrary to state law. This situation still existed this past year and continued to put the state's LEAs in an obvious bind: if they recommend medical treatment services necessary for a student to benefit from his or her education, then they are responsible under FAPE provisions to provide these services at no cost to parents. However, LEAs are prohibited from paying for such services. The result is that necessary services are not recommended.

Level of Local Resources

The availability of resources within school districts often is a factor in determining incentives for interagency cooperation. For example, consider the following two LEAs within the same state. The legislature has given LEAs leverage over other human service agencies by requiring in state law that these agencies cooperate with school districts in order to receive agency funding. One economically depressed LEA within the state has used the law to force interagency cooperation and gain some control over services provided to special education students. Another suburban LEA within the state, which is not as hard pressed financially, has not pushed for an integration of services. Thus, when adequate local resources exist, there is generally not a great need to seek formal interagency coordination.

Although it would seem obvious that districts with shrinking resources have a strong incentive to integrate services and districts with ample or adequate resources do not, our findings in some sites do not support this hypothesis. It appears that incentives greater than finances may be at work (e.g., gaining administrative control over student programming). In one district, for example, agencies have refined their interagency agreements for two reasons: finance and administrative control. To cope with funding cutbacks in both agencies, the LEA and DMH have refined their informal agreement over the provision of services to the severely handicapped, to the benefits of both agencies. More important to district personnel, though,

was that the district cutback on services contracted with other agencies gave them administrative control over special education service delivery. Although this change did not represent financial savings for the district (and in some cases the costs were higher), administrators felt that it gave them the control they really needed if the LEA was to be held accountable for service delivery under PL 94-142 provisions.

Summary

Our principal observations on the status of interagency coordination during the 1980-81 school year were the following:

- There is wide variation in the extent to which integration of services to the handicapped has been accomplished through interagency agreements. Establishing interagency agreements has not been enough; there is still a need to review laws and regulations pertaining to cooperative service arrangements and to revise those that can interfere with the provision of services to handicapped students, as well as to include provisions for accountability measures.
- Commitment of resources by SEAs and LEAs has facilitated interagency cooperation (e.g., technical assistance, coooperative planning).
- Adequate incentives must exist for education and other human service agencies to cooperate; and incentives vary, depending on local and state-level circumstances.

Changes in Services and Beneficiaries

Initial Evaluation and Placement Backlogs

Last year, we reported decreases in backlogs that previously existed in the majority of the study sites. In 1979-80, initial evaluation and placement backlogs were effectively reduced by use of two strategies: adding evaluation personnel and expanding services. Where available

resources did not permit use of these strategies, the backlogs were alleviated to some extent by using other strategies, such as increasing class sizes. Although the reduction of backlogs for initial evaluation and placement remained a priority for action in the study sites this past year, the majority of the LEAs continued to have backlogs, primarily at the evaluation stage. In 1980-81, the most common strategy used to address the backlog problem was hiring additional evaluation personnel. Fewer LEAs expanded services to accommodate more special education students as a backlog-reducing strategy. Special education administrators in one district, which had expanded services last year, changed their strategy this past year in response to new state regulations calling for more prereferral screening and tighter eligibility criteria for the resource program. Although prereferral screening, in general, did not expand dramatically this past year, several LEAs did use this strategy for attaining more appropriate referrals. In one district, a program implemented in 1980-81 by regular educators provided an early detection system for special education referrals at the kindergarten through 3rd-grade level. The assessments completed by diagnosticians have eased the evaluation burden for special education placement. A strategy used less frequently to deal with evaluation backlogs was increasing class sizes toward the maximum allowed by each state. However, an LEA psychologist in one district commented that special education classes are "brim full."

Placement backlogs were less frequent than those for evaluation, but they were a problem in a few sites. Even in the two LEAs with considerable program expansion this past year, district personnel reported that children were waiting for special education placement. In one district, children can wait up to a year for placement because of a lack of space and personnel. Recognizing the need for even more special education services, that LEA is planning program expansion in 1981-82. The other district also plans program expansion and, this year, is using options such as remedial classrooms or service in the regular classroom with an individual education program (IEP) to serve a continually increasing SLD population.

Reevaluation Backlogs

Our general finding last year was that the requirement to complete reevaluation of special education students every 3 years also resulted in backlogs. The study sites were just beginning to address their reevaluation backlogs, most often by hiring more evaluation personnel or by making the reevaluation process more systematic. This year, reevaluation backlogs remained a relatively low priority across the study sites. In one large LEA, for example, the district's management information system (MIS), which keeps track of the need for initial evaluations, annual reviews, and reevaluation, listed reevaluation as the third priority.

Although reevaluation backlogs were reported to be a problem in half of the study sites this year, only four districts seemed to be directly addressing these backlogs in their systems. The strategies used by these LEAs were to hire additional evaluation personnel and to allocate staff resources differently. One district was about 2-1/2 years behind in reevaluations, having regarded them as a low priority. This year, however, in an effort to be in compliance with this requirement, the LEA decided to hire a new psychologist specifically to perform reevaluations. Another district hired an intern psychologist to work under the district psychologist's supervision in an effort to reduce evaluation and reevaluation backlogs. Although this strategy helped to reduce the backlogs, anticipated budget cuts for next year have forced the special education director to delete the intern position from the budget. Because SEA monitors also cited reevaluation backlogs for corrective action, this local director is in a bind regarding how to cope with this situation next year. In a third district, referrals for initial evaluations had decreased, so the district psychologists were advised to reallocate their time to reevaluations, thus reducing the backlog from last year.

The reevaluation backlog problem grew substantially worse in only one district during 1980-81. This financially constrained urban LEA is the same district that had serious backlog problems last year. The ever worsening backlog (currently nearly 7,000 children) in this site is due to many

factors. First, as discussed last year, because the mental health agency that has the responsibility for conducting psychological reevaluations has several funding sources it has numerous priorities other than providing services for the school district and hence is slow to conduct reevaluations. In addition, several proposed changes in state regulations (regarding eligible handicapping conditions and required testing procedures) are contributing to the reevaluation backlog. For example, the proposed removal of one mildly handicapped category from inclusion under state law is causing LEA administrators to push for reevaluation of children in this category, to determine whether some of these children are eligible to be reclassified in another mildly handicapped category. SEA monitoring this year resulted in a demand for corrective action in this area.

Given all this pressure, the LEA special education director has developed several strategies to confront this problem; there is little support from either the SEA or the state mental health agency. This backlog problem is not amenable to easy resolution and may continue to grow.

Overview of Changes in Services and Beneficiaries

New program development and/or expansion of existing programs was evident in all the study sites last year. In contrast, during the 1980-81 school year, program expansion was more limited in scope, with few exceptions. For the most part, LEAs either maintained the status quo or filled in some gaps within their special education service delivery systems. Many districts focused on areas of programmatic weakness at the secondary level, especially with regard to SLD, seriously emotionally disturbed (SED), and vocational education programs.

Preschool Programs

New preschool programs or program expansion occurred in one-third of the study sites during 1979-80. During 1980-81, there were no new preschool

programs. Because the majority of the study sites now serve preschool children, the LEAs tended to focus their efforts on maintaining the status quo or on expanding the services that they already deliver. Four LEAs continued to use PL 94-142 preschool incentive grants to help maintain their programs. Three other districts used preschool incentive grants to expand their services at the preschool level. For example, one large LEA served more 4-year-old trainable mentally retarded (TMR) and orthopedically handicapped (OH) children this year. Another district added a class for hard-of-hearing preschool TMR children. Finally, an urban LEA hired four speech and language therapists under its preschool incentive grant.

Elementary School Programs

Although several new programs were introduced at the elementary level in 1979-80, the primary activity was the expansion of existing programs. In more than half of the sites, we found an increase in services to SLD students. In 1980-81, only one new program was started to serve a previously unserved population. Limited program expansion characterized the situation at the elementary level in about half of the LEAs. For the most part, districts seemed to focus on filling gaps in their special education service delivery systems. Compared with last year, we observed relatively little growth in SLD services across the sites during the 1980-81 school year.

However, one of the large urban districts started a new program for previously unserved SED students during 1980-81. Although the LEA had planned and funded three classes at the elementary and junior high levels, only one class (at the elementary level) was operational this year because state reimbursement for the classes arrived too late in the school year to fund more than one teacher.

Three other districts expanded their existing programs at the elementary level. A rural district filled a service delivery gap by adding an SLD resource class at one school. Now all member LEAs of this special

education cooperative have SLD programs. An increase in the SLD population prompted another district to open two cross-categorical classes to serve SLD, SED, or educable mentally retarded (EMR) students. Nevertheless, given LEA concern over funding levels for 1981-82, the district did not further expand its service delivery system, despite the fact that there were about 20 SLD students waiting for placement. In contrast, the third site, located in a Sunbelt state, expanded programs considerably for its increasing SLD population at both the elementary and secondary levels.

Growth in SLD services was not as great at the elementary level this year. In some instances, LEAs have continued to tighten SLD eligibility criteria. In response to stricter state eligibility criteria for the mildly handicapped population, one district decertified some children from its resource program. Now the resource program serves more severe SLD students, as well as some EMR and SED students.

Secondary School Programs

Last year, we reported that all but three LEAs were making progress in expanding services to handicapped students at the secondary level, particularly in the area of SLD and vocational education programs and services. Despite this growth in programming, SED programs for secondary students represented an area of great need. In 1980-81, in all but two of the study sites, LEAs were allocating resources to expand secondary programs for the handicapped to a greater extent than they targeted resources at other levels of their special education service delivery systems. In addition to changes in SLD services and vocational education programs, districts began to make some progress in addressing the unmet needs of secondary SED students. For the most part, LEAs again seemed to be filling gaps within their service delivery systems. In some cases, the programmatic changes were in response to outside pressures of court cases or SEA monitoring.

In general, SLD program growth at the secondary level was very limited; however, three districts experienced continued rapid expansion of these programs. One LEA expanded SLD services at both the elementary and secondary levels in response to the district's awareness of the unmet needs of its growing SLD population as well as parent pressure, and in accordance with continuing implementation of an SEA-developed policy of phased-in service expansion. Another large LEA added several new SLD classes at the secondary level to better serve an increasing SLD population. Both of these sites are in areas of rapid economic growth (i.e., the Sunbelt), so that resource limitations are not yet an obstacle to expansion. The third LEA offered an interesting contrast to the other two districts. In 1980-81, this large urban LEA was operating at a $70-million deficit, but placed program priorities on expanding services to the secondary SLD and severely mentally retarded (SMR) populations in response to the external force of legal pressure. Given the state's excess cost formula for reimbursement to LEAs, the district was able to accomplish this expansion despite declining local support for special education. However, the SEA wants to change its special education funding mechanism soon, to cut back on the state's cost of educating handicapped children. LEA administrators are growing very concerned about future budgetary constraints on the system.

About half of the study sites either expanded services to secondary SED students or were planning to do so in 1981-82. For example, one district that had opened a new facility for SED students last year, doubled the number of classes at this school in order to serve more students this past year. As the LEA special education director commented:

> ...in a large urban district, there is a greater number of this type of student.... I'm satisfied in my own mind that these students have been properly assessed and genuinely need the services in a self-contained class.

At least two other LEAs plan to address gaps in their SED programs in 1981-82.

Changes in vocational education program options and services for special education students are discussed in Section IV. However, it should be noted here that over half of the study sites addressed this area of need in 1980-81. In some cases, programs were added at the high school level. In others, new roles were created to better coordinate vocational services for special education students. Finally, some LEAs focused their efforts on trying to better match student skills with the requirements of specific jobs in the community.

LEA administrators in the two rural districts that did not expand services at the secondary level this year acknowledged that service gaps still exist. However, local support for special education is not strong. As one special education director commented, "This is a conservative area. We have to fight for what we get in special education."

The Handicapped Population 18 to 21 Years Old

Our 1980-81 findings regarding services to handicapped students aged 18 to 21 are presented in Section IV of this report. As was true last year, the general pattern is for LEAs to offer secondary students the opportunity to stay in existing special education programs through the age of 21. Although many of the more severely impaired students (e.g., TMR, SMR) do stay in school that long, mildly handicapped (e.g., SLD, SED, EMR) students tend either to drop out of school or to graduate by the time they are 18.

Services to the Severely Handicapped

Overall, there were few changes in either the nature or quality of services provided to the severely handicapped population (e.g., TMR, SMR). Nevertheless, a few LEAs did expand services to this population. In one large urban district, deinstitutionalization and legal pressure have forced the LEA to expand services to the SMR population within the public schools. In addition to new classes, a number of "model" SMR programs operated

throughout the district in 1980-81. There was also an effort to place SMR students in schools with peers their own age and to emphasize functional living skills in the community (e.g., going to the laundromat, riding buses). In another urban district, a TMR class was added at the high school level in response to advocate pressure to do more mainstreaming of the severely handicapped. Before the 1980-81 year, TMR students at the secondary level could be served only in special schools within the LEA. A rural district continued to expand its services to children in a state mental institution within its jurisdiction; the local special education director used PL 94-142 funds to hire teachers and aides to accommodate 25 more SMR children. Despite outreach to this population, the SEA monitoring team criticized the district this year for not serving all 160 children from the institution. Given tight local budgetary constraints and limited financial support from the state mental health department, it seems unrealistic to expect this district to take corrective action. As the special education director commented, "We've been acting in good faith. Maybe we should have gone to court instead of trying to serve kids." Finally, a fourth district plans to end its contract with a private agency that has been serving the district's SMR children. This year, the LEA used PL 94-142 funds to acquire the facilities necessary to serve these children within the district in 1981-82.

Services to Nonpublic Schools

For the most part, there were few changes in the provision of services to nonpublic schools within the jurisdictions of the study sites. Almost all the LEAs provide diagnostic services to the nonpublic schools, if requested. However, procedures have become more routine in some sites this year. In response to an SEA directive, issued last year, that LEAs are responsible for evaluating children in nonpublic schools, one LEA organized a new "special admissions team" this year to deal with services to children from nonpublic schools. The team, funded by PL 94-142 monies, is composed of five members: a program supervisor, a social worker, a psychologist, a speech therapist, and an SLD teacher. The team can provide referral,

testing, placement, and inservice functions for private schools who refer their students for LEA special education services. When making requests for evaluation and/or services, private schools must use all of the LEA's forms and must abide by its procedures. If it is determined that a student needs special education and related services that the private school does not have, then the student is enrolled in both the private and public schools.

Perhaps a few more LEAs provided direct services to nonpublic schools in 1980-81 than in the preceding year, but the services most commonly delivered continue to be speech therapy and SLD services. Only one site has gradually been expanding diagnostic and direct services to nonpublic school children within its jurisdiction; however, there was concern in that site about the impact of anticipated budget cutbacks on service delivery to nonpublic school children. Because parent expectations have now been raised, LEA officials anticipate public resistance if and when LEA services are cut back. As a district administrator commented, "The local diocese is ready for this fight and will go after us demanding services for kids who have been diagnosed and identified."

Private School Placements

A pattern that we have observed over the past 3 years is that LEAs have been able to reduce the number of students that they place in private day or residential schools primarily by expanding their own SEARS delivery systems to accommodate these handicapped students. During 1980-81, in one district that is experiencing continuing LEA budgetary constraints, the special education director, who came to the district 2 years ago, had reduced the number of students in private school placements by 50% (from 110 to 52) by opening special education classes within the LEA. This reduction has permitted reallocation of LEA resources to expand SEARS within the district. In another LEA experiencing budgetary constraints, very few children had been served in private placements. This past year, the district was able to return four hearing impaired children to the LEA program so that there were no children placed outside the district.

An urban LEA has had a history of due process hearings over the issue of private school placements. LEA administrators have attempted over the last 3 years to develop programs within the district in order to bring some students back from private placements. For example, during the 1980-81 school year, the LEA ran its own program for several autistic children formerly served privately. Although the LEA is actually paying more to serve these children through its own program than through its contractual arrangements with a local medical center, the district administrators have gained more fiscal and administrative control over their service delivery system. In addition, one key impetus for changing and improving services was that parents of autistic children were reported to be "very vocal."

Although local circumstances (e.g., legal/advocacy pressure, budgetary constraints) usually explain changes in private school placements, a change in state legislation somewhat affected a suburban district in one state this year. Because of the historical lack of private residential options for SED children within this state, the district has traditionally served large numbers of students in out-of-state residential placements. A recent change in state law slightly increased LEA access to residential options within the state. Although the district special education director thought that this change was a move in the right direction in terms of expanding the continuum of residential options to consider, there are still not enough appropriate residential settings to bring back all the SED students who are currently served in out-of-state placements.

One LEA was the exception to the general pattern, in that it slightly increased the number of students placed in private schools this year. Despite growth of SED services within the LEA special education delivery system, the system cannot accommodate all of the SED students who have been identified. As the LEA special education director noted: "We have 30 SED kids we don't have places for; they're either in SLD classes, at home, or in private schools."

Last year, we noted that the issue of fiscal liability for the full costs of educating handicapped children placed in private schools was a

major concern in two states: Illinois and Pennsylvania. In Gary B. v. Cronin, the plaintiffs objected to parents' having to pay for psychotherapy as a related service for children placed in private residential placements. Although Gary B. v. Cronin remains in litigation (i.e., the United States District Court for the Northern District of Illinois agreed to hear arguments from both sides),* an associated Office of Civil Rights (OCR) class action suit resulted in changes in interagency agreements for 1980-81. Clarification of fiscal liability was discussed earlier in this section under the status of interagency coordination.

The class action suit, Gittelman v. Scanlon, filed by the Education Law Center (ELC) against the Pennsylvania SEA and an LEA, also concerned the full costs of educating handicapped students in state-approved private schools. Parents were being charged the difference between the cost of SEARS in the private school and what the state paid toward tuition and related services. The Gittelman v. Scanlon case is still pending; according to ELC, settlement negotiations were in progress as of July 1981.

Status of Related Services

The provision of services related to special education increased slightly in half of the study sites during 1980-81. For the most part, changes can be characterized as "more of the same." Several LEAs used PL 94-142 funds to provide related services. At least two districts in different states used PL 94-142 funds for related services because these funds could be targeted to areas of need more easily than could state funds. Thus, the availability of PL 94-142 funds enabled the LEAs to provide services that were inadequately funded by their states. Federal funds also accounted for the change in related services in one other

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* NASDSE Liaison Bulletin, June 16, 1981.

district. This large urban district, in response to feedback from the SEA monitoring team and local advocacy pressure, used PL 94-142 funds this year to develop a parent training effort. In addition, the LEA used its PL 89-313 (Title I for the handicapped) funds to develop related services and supplemental aids needed by the district's many deinstitutionalized SMR students.

Two sites in different states provided catheterization as a new related service this year. In both districts, this service was added because the special education administrators anticipated the demand for it, given legal decisions in other states that ruled in favor of parents who requested catheterization. As one LEA special education director stated: "Rather than wait until we were told to do it, we did it."

At least two LEAs used strategies to "stretch" related services or to treat some related services as tuition items. One large district increased its physical therapy (PT) services this year by using PT technicians. The special education director, always looking for ways to maximize his special education dollars, analyzed state personnel requirements and found that PT services need only to be supervised (not provided) by physical therapists. Thus, PT technicians now deliver services at a cheaper rate (which provides twice the services for the same amount of money), and physical therapists supervise the technicians. In anticipation of future funding cutbacks, district administrators in a special education cooperative plan to use the strategy of "pricing out" related services to its member LEAs. This past year, for example, occupational therapy, physical therapy, and adaptive physical education services were transferred from the PL 94-142 budget to the cooperative's regular special education budget as tuition items for the member LEAs that use such services.

Recommendations in IEPs

In general, there are no changes from our 1979-80 findings that IEPs for students in LEA-based programs regularly include needed related services

to the extent that: (1) the LEA provides these services directly, (2) they are provided by contract with another agency, or (3) they are provided on the basis of a personal agreement between an LEA administrator and his or her counterpart in another agency.

In practice, what this means is that the services recommended in the IEP are the related services accessible to the LEA. This does not always translate into what is "appropriate" for a student. As one LEA psychologist commented: "It's more realistic but not necessarily meeting student needs." Although LEA personnel in the study sites were concerned about meeting the needs of their special education population, special education administrators in all the LEAs remained concerned about district liability for IEP recommendations of related services. Three LEAs continued explicit policies regarding what services could be recommended in the IEP because district administrators view the IEP as defining the LEA's legal responsibility. One of these LEAs established a committee during 1979-80 to review the results of diagnostic evaluations to determine which students required psychotherapy as a "necessary IEP related service," and this year, they established a similar committee for recommending OT and PT services in the IEP.

Few LEAs have explicit policies regarding services that may or may not be recommended in the IEP, but the issue of psychotherapy as an educationally related service continued to generate concern in many of the study sites. As reported last year, the majority of the LEAs regarded psychotherapy and psychiatric counseling services as medical, not educational services. The LEAs therefore drew a line at the medical/educational border of responsibility. In 1980-81, 10 LEAs (including 2 of the 3 LEAs mentioned in the previous paragraph) still considered psychotherapy and psychiatric counseling to be noneducational services.* District administrators' concerns were often based on a large demand for these services and/or on past experience with due process hearings (or the possibility of hearings) over district liability for suggested or actual service recommendations. In one district, state law still defined psychotherapy as a medical service, and in another LEA, the

SEA continued its policy that LEAs are not required to provide psychiatric services beyond diagnosis. Five LEAs have not classified psychotherapy and psychiatric counseling as either educational or medical services because the issue has not arisen (i.e., there is little demand for these services). Finally, one district may or may not recommend psychotherapy, depending on the diagnostic evaluation committee's recommendation as described in the preceding paragraph.

Remaining Challenges for Local SEARS Delivery Systems

As was true last year, individual school districts in 1980-81 still had specific areas of unmet needs that depended primarily on their local contexts (e.g., local tax base, nature of handicapped student population, parental expectations, history and tradition of SEARS delivery system). Although these unique needs, or remaining challenges, continued to be influenced by such local factors, the influence of external factors on LEA special education administrators' perspectives of remaining challenges seemed greater. Anticipated cutbacks in federal and state funding for special education were a pervasive concern. Despite some limited program expansion this year, contraction may very well characterize local special education service delivery systems in the 1981-82 school year. Thus, whereas in 1980-81 the LEAs addressed some of the programmatic gaps that we identified last year (e.g., SED and secondary programs), the remaining challenge will be to maintain the status quo or to expand special education programs, given steadily diminishing resources to meet the unique needs of handicapped children.

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*Section 300a.13 of the final regulations defines counseling services as "services provided by qualified social workers, psychologists, guidance counselors, or other qualified personnel." Currently, the policy issue of whether schools should provide special education students with "necessary" services such as psychotherapy and psychiatric counseling is still unresolved at the federal level.

Summary

The following are our findings regarding expansion of services and increases in the number of beneficiaries served during the 1980-81 school year:

- Backlogs for initial evaluation, placement, and reevaluation continued to exist in the majority of LEAs. Reevaluation backlogs remained a low priority, but a few LEAs used various strategies to reduce this problem.
- With few exceptions, program expansion was more limited in scope than last year. Most LEAs focused their efforts on addressing gaps at the secondary level.
- Although there were no new preschool programs this year, a few LEAs expanded and refined their preschool programs.
- Limited program expansion and refinement occurred at the elementary level.
- Districts allocated more resources to the secondary level than to any other age range in order to address programmatic gaps.
- Efforts at the secondary level focused primarily on the areas of SLD, SED, and vocational education programs for handicapped students.
- Few changes occurred in providing services to handicapped individuals aged 18 to 21. LEAs generally provide secondary students with the opportunity to remain in school through the age of 21.
- Few changes were observed in either the nature or quality of services to the severely handicapped. However, a few LEAs did expand services to this population, primarily in response to internal and external pressures.
- Almost all the LEAs provided diagnostic services to the nonpublic schools within their jurisdictions. Perhaps a few more than last year provided direct services, which were typically SLD and speech therapy services.
- LEAs continued to reduce the number of students that they placed in private day or residential schools, primarily by expanding their own SEARS delivery systems.
- Provision of related services increased slightly in half of the study sites, but the changes can be characterized as "more of the same." PL 94-142 funds were often used to expand related services.

- Related services recommended in IEPs continued to be those that were accessible to the LEA. The majority of the study sites considered psychotherapy to be a medal rather than an educational service.

III MEETING NEEDS AT THE ELEMENTARY & SECONDARY SCHOOL LEVELS

The preceding section presented findings related to LEA special education service delivery systems in response to the requirements of PL 94-142, as well as to local contextual factors and outside influences. In this section, we discuss the school-level changes with regard to those requirements of the law that directly affect the extent to which the needs of individual students are met. First, we present findings on prereferral screening, which is designed to intervene before children are referred to special education and to provide "high-risk" children with supportive services in the regular classroom. Next, we examine changes in the evaluation-to-placement process, including evaluation/reevaluation procedures. We then discuss changes in IEP practices and parent involvement in school-level decisionmaking about their children. Next, we describe how the concept of least restrictive environment (LRE) is affecting the continuum of program options and the coordination of mainstreaming activities between regular and special education. Finally, we describe changes in personnel roles and inservice training for special and regular education personnel.

Prereferral Screening and Intervention

Elementary School Level

Last year, we found that in about half of the LEAs the use of prereferral screening and intervention strategies at the elementary school level had increased. These strategies were designed to decrease the number of inappropriate referrals and thereby to reduce the number of referrals to

special education generally. This year, given the context of limited program expansion and expected contraction of services in 1981-82, we expected to find an even greater emphasis on prereferral screening and intervention. However, we did not see as large a change as expected. At least one-third of the LEAs in our study continued to have no formal prereferral intervention strategy. In those sites that had initiated or expanded formal prescreening in 1979-80, their efforts continued at about the same level. Only three LEAs significantly expanded their prescreening intervention efforts for 1980-81. These three LEAs were the sites affected by California's Master Plan for Special Education and one progressive district in another state.

California's new Master Plan regulations, being implemented this year, "prohibit" special education referral without consideration or use of regular education program resources. Previously, interventions were merely encouraged, but tighter regulations were instituted as a result of statewide complaints that special education programs were being overloaded. In response to these new regulations, and in an effort to reduce inappropriate referrals (in response to the new state cap imposed on the number of special education students that can be counted for state reimbursement purposes), both of the Master Plan sites in our study have placed more emphasis on their prereferral intervention efforts. For example, in one district, the special education administration tried to get resource specialists to emphasize interventions such as Title I or special reading programs prior to referral to special education. The other LEA developed, and is using, standardized or teacher-developed instruments for prereferral screening; these instruments include an adaptive behavior scale and a classroom observation scale. These changes indicate a more formal, systematic attempt toward prereferral intervention in this LEA. This effort already is having an effect; a resource specialist noted that "only 2 out of 50 [referred] did not qualify." In this LEA, the special education director views the prescreening aspect of the new Master Plan regulations as a positive move because it gives the district some needed influence with regular education to prevent special education from becoming a "dumping ground". As he commented: "For the first time, due to the Master Plan guidelines, we are

doing more prescreening. We have more teeth as to what regular education teachers must try."

Only one other district significantly expanded its prereferral screening and intervention efforts for 1980-81. This suburban district continued its focus on school-based prereferral intervention. In one school, the pupil services team continued to review each regular teacher's class list to identify any "high-risk" children with learning problems. The team members then provided the regular teachers with information or materials on intervention techniques that might be appropriate for specific children. In 1979-80, only children in the primary grades could get remedial help; the intermediate-level children could only be put on a "watch and consult" basis. In 1980-81, the program expanded to provide more services to intermediate students (grades 4-6) who are slow learners. This program provides support to students in the areas of reading and math. The students move through a learning center and the SLD resource room. A full-time aide was hired this past year to help with the program. Although the SLD teacher cannot provide direct services to regular education students (under state law), she does consult with the learning center aide and the regular teachers to develop plans for children. She also provides materials to the aide and the regular teachers.

This district also demonstrated its commitment to increased prereferral interventions by continuing a pilot Teacher Assistance Team (TAT) approach with its own funding when the OSE grant ended. The goal of this team approach is to assist regular teachers to help children with learning or behavior problems within the regular classroom setting by individualizing instruction.

This general pattern of little expansion was further highlighted by three LEAs that either cut back or did not implement planned prereferral efforts. The two LEAs that deemphasized prereferral intervention were responding to outside pressures. One of these LEAs instituted prereferral intervention in anticipation of the requirements from a court case; however, the decision is now on appeal, and the requirements to attempt intervention

strategies before special education referral were dropped by the LEA for 1980-81. Although this move has decreased the burden on regular and special education teachers, it has resulted in even more inappropriate referrals and has increased the burden on the psychologists who are responsible for conducting initial evaluations. In the other district, procedures were tightened as a result of OSE monitoring in 1979-80, so that informal interventions (i.e., the resource teacher would take informal referrals from regular teachers and "watch and consult" to determine whether official special education referrals were indicated) are no longer permitted. A principal explained that resource teachers no longer do this because parent permission "must be given, according to the law. The psychologist must verify the disability first [before any service can begin]."

Finally, in a large urban district, a key special education administrator had planned in 1979-80 to make increased use of prereferral intervention his next priority. For example, as part of the LEA's overall referral-to-placement model, it was anticipated that after a referral was submitted, an instructional advisor would observe the student in the regular classroom setting and would provide recommendations to the teacher regarding possible intervention strategies. However, because of outside pressures such as monitoring and court cases, the LEA's priorities had to be put elsewhere, so that resources and energy were not directed toward prereferral intervention in 1980-81.

Secondary School Level

In general, prereferral screening was not a big issue at the secondary level; although efforts similar to those at the elementary level often exist, they are often less emphasized and less systematic because there are fewer referrals at the secondary level than at the elementary level. Thus, although many of the changes referred to earlier in this section were districtwide (and thus also applied to the secondary level), the impact of those changes at the high school level was far less, and we found no changes this year in prereferral screening specific to the high school level.

However, with the implementation of minimal competency testing (MCT), an interesting issue arose. In several sites where there was concern that regular students failing the competency tests might try to get into special education to benefit from differential standards (if they exist), some people felt that more emphasis might have to be placed on high school prescreening efforts in the future. For example, a program manager in one LEA mentioned this as a "potential" problem area that needs to be carefully monitored.

Summary

To summarize, the findings from the 1980-81 examination of prereferral screening and intervention strategies were the following:

- The overall pattern was no large increase in the emphasis on prereferral intervention; this was contrary to our expectations, given the context of anticipated cutbacks in special education.
- Few sites expanded their prereferral intervention efforts or initiated new ones; as a result of outside pressures, several LEAs decreased their emphasis on prereferral intervention.
- There were some exceptions to this general pattern, the most prominent of which were in the LEAs subject to California's Master Plan for Special Education; because of a change in Master Plan regulations, there was a further emphasis in these sites on prereferral intervention.

Changes in Evaluation and Reevaluation Practices

Initial Evaluation Practices

Last year, we reported that nearly every study site attempted to meet the intent of PL 94-142 through the use of a multidisciplinary approach to evaluating children for special education. We also noted that, in the majority of the LEAs, evaluation practices had changed little from 1978-79

except where stimulated by outside forces such as the courts (e.g., the Larry P. v. Riles and Mattie T. v. Holladay decisions) and monitoring by OSE and OCR. In addition, we observed several examples of refinement in evaluation practices. Although most LEAs emphasized individually tailored evaluations, the availability of services, as well as special education eligibility criteria, continued to strongly influence decisionmaking concerning student placement.

Despite similar findings this year, we found no major changes or refinements in evaluation practices in over half the LEAs visited during the 1980-81 school year. LEAs continued to use a multidisciplinary approach to evaluation. In fact, when recently monitoring a large urban district, the SEA commended the LEA on its 3-year-old school-based assessment model, which incorporates multidisciplinary evaluation practices.

In the few sites where there was some change this past year, the evaluation picture at both the elementary and secondary levels shifted slightly, in response to both external and internal factors. Outside forces (e.g., state regulations and monitoring, OSE monitoring) have had effects on evaluation practices in some sites; however, the changes demanded by these external factors in 1980-81 seemed to be more in the nature of refinements, rather than major changes. This may be because restructuring of entire evaluation systems usually occurs as a result of court cases, and there were no new court cases influencing evaluation practices in 1980-81. In addition, the changes demanded by previous court cases have already been made. In some sites, factors internal to the LEA context accounted for small refinements in local evaluation practices. These refinements, in response to both external and internal factors, are discussed below.

Effects of External Factors

The influence of court cases on evaluation practices was less in 1980-81 than in 1979-80 because there have been no new cases in the study sites, and the sites affected by the two previous court cases, Larry P. v.

Riles and Mattie T. v. Holladay have made the changes demanded of them. For example, in response to Larry P. v. Riles, sites in California continued such practices as rarely classifying youngsters as EMR or not using IQ tests as the sole criterion for EMR placement. In addition, the Mississippi site affected by Mattie T. v. Holladay instituted shorter timelines between referral and placement, as well as multidisciplinary evaluations; these changes continued, although the Mississippi SEA was appealing the Mattie T. case.

The major outside influence on evaluation practices this year, however, was the state education agency. Although the changes demanded by the SEAs varied, they concerned mainly refinements in existing evaluation practices. No consistent pattern was evident in what the states emphasized; perhaps each state simply reacted to areas of weakness in the LEAs.

In California, new Master Plan regulations (in effect in 1980-81) gave LEAs the option to collapse the dual-level assessment system (i.e., school level and district level). The effect of this change on school-level assessment during 1980-81 was site-specific in the two Master Plan districts studied; the state guidelines are vague, and each district interpreted the guidelines differently. In one site, the guidelines had little effect on evaluation; the only change was that the district-level assessment committee met on the school site, which increased parental participation. On the other hand, although special education administrators in the second district had no intention of moving to a single-level assessment system, the LEA psychologists took on a consulting role to the resource specialists at the school level. This move was motivated, in part, by the allowance of a single-level assessment; it helped to avoid duplication of effort (e.g., retesting) because the psychologists could discuss the need for additional district-level assessment with the resource specialists. It also relieved some of the additional burden that the resource specialists have assumed under the Master Plan.

SEAs in other states influenced LEA evaluation practices in several other ways. In one site, SEA monitors told the district during 1979-80 that

individual achievement tests must be given every year because tests of group achievement were not sufficient. Therefore, in 1980-81, this district added individual achievement tests at both the elementary and secondary levels and (1) trained every special education teacher to give these tests; (2) gave teachers proficiency exams to make sure that they had been adequately trained to test children; and (3) bought materials to be used in each school building. The SEA also encouraged LEAs in the state to let the multidisciplinary placement team have more discretion in making decisions about a child's placement in special education.

In another LEA in a different state, new evaluation forms were added to comply with SEA requirements. There is now a special page for recording informal testing results of secondary-level students. High school special educators told us that they appreciated this procedural change.

Finally, we saw one change motivated by OSE monitoring. As a result of OSE monitoring in 1978-79, one large district added a bilingual assessment team this past year. There are 65 different languages spoken in this city, but because Spanish is the most prevalent, the LEA decided to target this population's needs when taking some corrective action toward meeting PL 94-142's nondiscriminatory and native language testing provision.

Effects of Internal Factors

A few sites refined their evaluation practices this year in response to internal factors. These changes generally streamlined procedures that were already in effect or were part of an effort to pay greater attention to the individual needs of handicapped children. For example, two LEAs attempted to avoid duplication of effort in their evaluation systems. In one district, a central assessment team approach was implemented at the elementary level to reduce duplication of testing and to share the educational testing among the psychologist, the educational diagnostician, and the SLD teachers. The central assessment team reviewed all referrals once a week and then developed an assessment plan to divide the evaluation

responsibility. This strategy worked until the SLD teachers' caseloads increased to the extent that they could no longer share the educational evaluation responsibility with the educational diagnostician. At the time of our site visit, a committee was working to develop a new evaluation strategy. The other LEA, one of the California districts, took advantage of external changes in Master Plan regulations and made an internal decision to have LEA psychologists consult with resource specialists at the school level, as mentioned earlier in this section. This change helped to reduce duplication of testing between the school and district assessment levels.

Refinement of evaluation practices also occurred in a high school district in one special education cooperative. This effort was directed toward better meeting the needs of potential SED students. Because the district felt that the diagnosis of these students had been inadequate, the LEA contracted with a psychiatrist for one day a week to address this diagnostic gap in the evaluation system. In addition, diagnostic and eligibility criteria for this population were clarified. The director of special education felt that the needs of these adolescents were now being met: "We're doing a better job diagnostically--we're paying $40 an hour for the best. He'll meet with kids for as many as 10 sessions to complete his diagnosis." Finally, another district, in a different state, changed the assessment test battery slightly this past year to provide a better overview of student ability. In addition, the district received a grant from a local company that enabled it to initiate a new screening team to provide better assessment of nonverbal children (an area of weakness in this LEA's evaluation system). This broad-based team of seven members was trained in special testing procedures, the use of which should provide a better picture of students' needs.

Independent Educational Evaluation

Section 300a.503 of PL 94-142's regulations states that the parents of a handicapped child have the right to obtain an independent educational evaluation at no cost to them if the parents disagree with an LEA's

evaluation of their child, unless the LEA initiates a due process hearing to show that its evaluation is appropriate. If parents initiate an independent educational evaluation at their own expense, the results must be considered by the LEA in making decisions about the provision of FAPE to a handicapped child.

This year, we investigated parental use of their right to an independent educational evaluation. In general, we found that most of the LEAs in our study did provide information to parents concerning their right to an independent evaluation at public expense if they disagreed with the LEA's evaluation. This information often was given in the form of a written statement of rights, or a "parents' rights" booklet. LEAs often gave such statements to parents before the initial evaluation (e.g., when parents gave their consent to have their child evaluated).

In the majority of the sites studied, parents very seldom exercised their right to an independent educational evaluation. In some sites, we heard that parents never asked for such evaluations, and in others, that parents rarely requested them (e.g., one percent of the time). For the most part, parents appeared to be satisfied with the evaluations conducted by the LEAs. It should be noted, however, that although LEAs did inform parents of their rights regarding independent evaluations, district personnel did not generally emphasize this parental right strongly.

When we asked district personnel about how they "consider" the few independent educational evaluations that parents may bring to them, most indicated that they did consider them to some extent. For example, we heard the following:

- In one LEA, the district evaluators looked at the independent evaluation data and used "what we are comfortable with."
- In another district, the multidisciplinary staffing team considered an independent evaluation "along with our other data" when making placement decisions.

- In another site, the director of psychological services said that, when confronted with an independent evaluation: "Most of the time you acquiesce to the parents because they have to sign before you can act. If they went out and paid for this independent evaluation, you try to go along; we don't fight them in the courts."

- In a fourth district, a guidance counselor commented that when an independent evaluation supports the LEA's evaluation in general, she draws on findings from both evaluations in making her recommendations for a child.

Thus, it appeared that districts at least attempted to consider independent educational evaluations. We did hear of one exception, however, which specifically concerned independent psychiatric evaluations. In this district, the director of special education would not accept any psychiatric hospital's evaluation: "I want my own psychiatrist to do the evaluation." This attitude was not surprising, given the district's experience in this community (i.e., local psychiatrists have urged parents to make unilateral private placements without LEA involvement and parents have then sought payment from the school district).

Changes in Reevaluation Practices

There seemed to be no major changes in reevaluation practices this year in the sites visited. Reevaluations generally continued to be of low priority, except in sites where outside factors (court cases, monitoring) have changed this by highlighting reevaluation backlogs. Various LEA attempts to reduce backlogs in response to outside forces are described in Section II.

In comprehensiveness, the reevaluations generally tended to be very similar to the initial evaluations, although in at least one district, we learned that the SEA was considering changing its requirements and might encourage LEAs to update only the components of the evaluation that were invalid. In at least one other LEA, an attempt was made this past year to streamline the reevaluation process. As an LEA psychologist commented: "...it's ridiculous to think you're going to do the whole thing over when

you already have reams of data on the kids." LEA policy essentially advised psychologists to look at the disability and to test differentially. For example, SLD students would not be given IQ tests unless the special education teacher specifically requested it.

In sum, although there have been changes in several sites regarding reevaluation, in the majority of our sites, reevaluation practices (both the procedures and the priority) remained essentially the same. The major change we saw in the area of reevaluation was that, in several sites, reevaluations became more of a priority in response to such external factors as court cases or monitoring.

Summary

The findings during 1980-81 regarding changes in evaluation and reevaluation practices are summarized as follows:

- LEAs continued to use a multidisciplinary approach to evaluation, which reflects the intent of PL 94-142. External factors, primarily the SEA, had some impact on local evaluation practices, but more in the direction of refinements than of major changes.
- A few LEAs, under their own initiative, refined their evaluation practices in order to streamline procedures or in an effort to pay greater attention to individual needs of handicapped children.
- Although most LEAs emphasized individually tailored evaluations, the availability of resources, as well as eligibility criteria, continued to strongly influence decisionmaking concerning student placement.
- Most LEAs provided parents with information on their right to an independent educational evaluation at public expense if they disagreed with an LEA evaluation. However, district personnel did not generally emphasize this parental right strongly. Parents rarely exercised this right, but when they did, the LEAs at least considered the independent educational evaluations in making decisions about a child's placement.
- Reevaluations generally continued to be of low priority, except in sites where outside forces (court cases, monitoring) have highlighted reevaluation backlogs.

IEP Practices and Parent Involvement in Decisionmaking

Changes in IEP Practices

In January 1981, the Secretary of Education issued an interpretation of the individualized education program (IEP) requirements under PL 94-142. As part of this interpretation, the Department of Education reiterated that IEP objectives (also called short-term objectives) must be written before a child is placed in special education. The department also stated that the IEP is not intended to be detailed enough to be used as an instructional plan. The following distinction was made in this regard:

> IEP objectives provide general benchmarks for determining progress toward meeting the annual goals. These objectives should be projected to be accomplished over an extended period of time (e.g., an entire school quarter or semester). On the other hand, the objectives in classroom instructional plans deal with more specific outcomes that are to be accomplished on a daily, weekly, or monthly basis.*

Given this recent clarification, it was interesting to find that the major changes in IEP practices observed this year in the study sites were related to when short-term objectives are written, and to the nature of these objectives themselves. In a few LEAs participating in the SRI study, recent OSE or SEA monitoring has had an impact on completing the IEP (including short-term objectives) in a one-step process before placement. We also found a pattern, in over half the LEAs, toward writing broader short-term objectives in the IEP, making the IEP less like an instructional lesson plan. Although the reasons for this latter change varied, most commonly it was made in response to OSE or SEA monitoring or state directives.

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* Federal Register (Vol. 46, No. 12), January 19, 1981.

These changes are discussed below. First we discuss those motivated by external factors, followed by those motivated by internal factors. We then discuss several interesting exceptions to the general pattern of findings, as well as changes specific to the secondary level. Finally, we describe changes in the time and paperwork burden of IEPs.

Effects of External Factors

In 1979-80, LEAs in the study still tended routinely to write short-term objectives within 30 days of a child's placement in special education. The special educators' rationale for this practice was that it met children's needs better because the special education teacher had time to work with a child before writing the short-term objectives. In 1980-81, primarily in response to the outside pressure noted above, a few districts in three states changed their practices to comply with OSE's interpretation that IEP objectives must be written before placement. Although the SEA in a fourth state reiterated this IEP requirement to its LEAs, we saw no impact at the school level in the two study sites visited there this year.

In one district where staffing teams had to complete the short-term objectives before placement, as well as reconvene for changes in the IEP,* IEP objectives were generally broader, so that they encompassed any minor changes that might be made in service delivery to avoid additional staffing team meetings. For example, a short-term objective covered a year and might state that "the student will learn upper case letters."

Another district also made substantial changes in IEP practices, in response to SEA directives. This year, the IEPs were not typed so that they

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*The OSE interpretation is that a change in IEP objectives constitutes a revision of a child's IEP and, therefore, requires the LEA to initiate another IEP meeting.

would not appear too "pre-prepared" to parents. The placement team no longer mentioned specific materials in the IEP; they also wrote broader short-term objectives. Because of these changes, the IEP written at the placement meeting was called an "interim" IEP. This interim IEP was of necessity more general than the old IEP in this LEA--i.e., it was a skeleton IEP. School-level personnel told us that the short-term objectives "need to be goals, not objectives." For example, a goal might be "to improve reading skills" whereas an objective would be "to be able to blend sounds." Generally, these short-term objectives were stated in a one-line phrase.

In the sites where IEP objectives had become broader, it was generally agreed that, as a result, the IEP was less useful as a daily instructional guide.* For example, some teachers reported that they could no longer teach from the IEP. Nevertheless, we saw examples of teachers adapting and compensating for this change. In the district where the placement team completed an interim IEP, one teacher told us that she took the interim IEP and rewrote it into a more specific form after placement; this new IEP was then discussed with a child's parents in a conference 30 days after the placement meeting. Another teacher said that she used the interim IEP until a more specific IEP was written at the first annual review. During the year, however, this teacher unofficially filled in some specifics (including progress made) in the interim IEP. She also wrote more detailed lesson plans to substitute for the previously more specific IEP.

Thus, it appeared that many teachers were compensating for the loss of the more specific IEPs. In fact, even though some people saw the move to broader IEPs as a "step backward," the fact that IEPs were more specific in the past may have a long-lasting benefit. That is, according to one administrator, although IEP objectives may be more general now, the positive

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* However, this finding is consistent with OSE's position regarding the appropriate level of detail of short-term objectives.

effects of teachers' writing specifics in the past may "stick with them" and help them to teach more effectively.

Because the teachers adapted to the changes in IEP procedures, it seemed that the new procedures did not affect the children served. That is, teachers added objectives, used lesson plans instead of the IEPs, or "started all over anyway," and the children did not appear to have suffered. However, a teacher in one LEA pointed out some disadvantages to this pattern. She noted that parents liked more detailed, rather than less detailed, IEPs. She also thought that more detailed IEPs had helped the special education teacher who received students the following year.

Effects of Internal Factors

Several other sites also changed the IEPs to be less like lesson plans, although in response to internal factors, rather than state or federal influence. In one rural district, special education teachers attempted to make the IEPs "for parents," by adjusting the language of the IEP to the parents' level of understanding. One teacher noted, "This communicates to parents better. We went haywire at first: they [IEPs] were lesson plans and written for clinicians." In another rural site, teachers were also writing less technical and less specific short-term objectives in IEPs in order to make them more understandable to parents. For example, one teacher changed the wording in one IEP from "will decode 20 words" to "will read at the fourth grade level by Christmas." Finally, the director of special education in a third site streamlined the IEP process this past year by limiting the number of short-term objectives to three. This change, at the director's initiative, was an attempt to reduce paperwork and to reassure teachers that they did not have to specify every detail in writing IEPs.

Exceptions to the General Pattern

Whereas short-term objectives did become broader in over half of the study sites, we found two sites where IEPs became more specific. In these two districts, the changes were motivated by both external and internal factors.

In response to a court case, one LEA made a greater effort in 1980-81 to improve programming for its SMR population. As part of this effort, IEPs for these children became more specific and were 10 to 12 pages long. Although one special educator referred to these longer IEPs as the "Chinese menu method," more aspects of services for SMR children were included. For example, a community life skills component (e.g., personal maintenance, recreation/leisure) was written into the IEP.

The other district, motivated by the LEA's concern for teacher accountability, also made its IEPs more detailed. The major change in the IEP form was the addition of an "IEP insert." This insert is a separate sheet that contains the short-term objectives. These objectives are developed after placement on the basis of a teacher-administered diagnostic instrument. Teachers update the short-term objectives in the insert every 6 weeks during the school year. This change in the IEP process accompanied several other changes made in response to compliance concerns. The district now uses about 40 new forms to meet state requirements and requires more professionals to be involved in the staffing team meetings.

In the two sites where IEPs became more specific, there was agreement among LEA personnel that this change was better for children. For example, the new IEPs for the severely and profoundly handicapped population made the teachers address program components that they viewed as the "perfect thing for these kids." The reaction to the "IEP insert" in the second district was also positive. Elementary teachers felt that, because the insert was easily kept in the classroom, it helped teachers to become more organized and to keep up with their children's progress. For example, one teacher reported that she tended to look at the insert every week and informed the

parents (by mail) every 6 weeks of their child's progress vis-a-vis these goals. The teacher reported that this insert also helped her to better communicate with parents. The high school teachers also praised the IEP insert. One teacher felt that the insert gave her a chance to plan in more detail, which was useful. Another teacher said that the insert was easily kept in the room and referred to; she added that the insert made the IEP "so greatly improved," and made IEP writing easier.

Changes in IEP Practices Specific to the Secondary Level

In several study sites, we observed changes in IEPs that were related to issues specific to the secondary level. The first such change related to the coordination between special education and vocational education. In a number of sites, we saw greater coordination between the two through use of the IEP document. For example, in two districts, personnel involved in vocational programs attended IEP meetings at the high school level for the first time, helping to coordinate the vocational and academic components of students' programs. In other sites, vocational objectives were expanded. For example, in one of these LEAs, the vocational rehabilitation counselor assisted with writing the vocational component of the IEP for all special education students. In another district, although vocational objectives had been written for EMR students for the past several years, in 1980-81 the special education work experience program coordinator also contributed objectives for SLD and SED students.

Another change in IEPs, relating to high school suspension/expulsion procedures, was found in one site. Because in this district it was now possible to expel a special education student whose offending behaviors were unrelated to his or her handicap, the IEP now included statements of concomitant behaviors not related to the handicap, such as truancy or drug/alcohol abuse.

Changes in Time and Paperwork Burden of IEPs

This year, we generally found that, unless procedural changes required school personnel to do more work, the time and paperwork burden of IEPs continued to lessen as people devised shortcuts or accepted the IEP process as a routine part of their jobs. As one teacher remarked, "...this is the way it is: you quit complaining; you do it." In addition, in districts where IEPs had become broader or simpler, respondents felt either that the burden had lessened or that it had at least stayed the same and was perhaps more accepted. One reason that the burden had not lessened in a few of these LEAs may be that, although the IEPs written at the placement meeting may have been broader, teachers ended up doing what they used to do, either by filling in more details in the IEP later or by using a specific lesson plan to substitute for the less specific IEP.

In general, the only complaints we heard about the IEP process came in the LEAs where new procedures that had been imposed were perceived as burdensome. For example, in a district mandated by the SEA to reconvene the staffing team for IEP revisions, we heard complaints about the additional time burden. In addition, in the two districts where the IEP had become more specific and more like lesson plans, we also heard complaints (although balanced by the feeling that the IEPs had become more useful). In one of these latter sites, it was agreed that the paperwork burden had increased since last year. Teachers felt that this may have had some negative effects on children, because some teachers would leave their students with busy work so that they could fill out the numerous new forms. Other teachers in this district called the increase in paperwork "unbelievable." At least one teacher claimed that her "kids are paying the price"; in addition, the teacher reported that some teachers worked on their IEPs during inservice training, because they received no release time to do IEPs. To confront the paperwork burden in this LEA, district administrators set up an ad hoc committee of teachers to see whether the number of forms could be reduced while still complying with federal and state requirements.

Parent Involvement in School-Level Decisionmaking

As was the case last year, parent involvement and satisfaction, although not necessarily linked, continued to vary greatly, both within and between districts; factors influencing the level of parental involvement or satisfaction (e.g., traditions, neighborhood demographics, school policy) were discussed in last year's report. Last year, we also found that, in most of the LEAs, the quantity and quality of parental involvement were low; that is, parent participation was low, and few parental contributions were substantive. This year, at both the elementary and high school* levels, the picture was essentially the same; most parents did not participate much, and they continued to make few substantive contributions to decisions regarding their children. The few exceptions to this pattern pertained to the quantity of parent involvement; some districts implemented changes in practices that either encouraged or discouraged parental involvement. But even in places where parent participation may have increased and parents may have felt less inhibited, talked more, and understood more, the lack of substantive parent involvement continued.

In the district where parent involvement was encouraged by an effort to adjust the language of the IEP to the parents' level of understanding, there seemed to be more sharing of information about children on parents' day. However, although parents might have understood more and been better informed, their contributions continued to be nonsubstantive. According to a district survey in another LEA, parent participation at the placement meetings (though still low) increased 11.3% from 1979-80. This change was attributed to the district's concerted effort to conduct all staffing meetings at the school level this past year rather than at the district level.

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* Parent involvement at the high school level continues to be less than at the elementary level.

Two rural districts encouraged parent participation at the secondary level by changing procedures this past year. In one LEA, the guidance counselor met with parents before the placement meeting to discuss what would take place at the meeting. Although this lessened the feeling of intimidation on the part of parents and led to their feeling more informed and saying more, there was no change in the nature of their input (i.e., it was still nonsubstantive). The other district required the special education coordinator to chair the high school IEP meetings. Because of this, "parents are better being made aware of their rights--parent participation is better now." However, even though the parents might have talked more, their contributions did not tend to be substantive.

Finally, we saw only one example of a new district practice that discouraged parent involvement. In an LEA where the number of forms had proliferated rapidly since last year, we heard that it was harder to get some parents to come in for the placement meetings because they felt as if they were "signing their lives away" with so many forms.

Summary

Regarding changes in IEP practices and parent involvement in decisionmaking, our findings in 1980-81 were as follows:

- Major changes in IEP practices observed in the study sites were related to when short-term objectives are written and to the nature of these objectives. In response to OSE and SEA monitoring, some LEAs were completing the IEP in a one-step process before placement rather than completing them after placement. Over half the LEAs were writing broader short-term objectives in the IEP, making the IEP less like an instructional lesson plan.

- Many teachers adapted to less specific IEPs, and it appeared generally that the new procedures did not negatively affect the children served. In some cases, the use of less technical IEPs made the IEPs more understandable to parents.

- At the secondary level, greater coordination between special and vocational education occurred in some sites through the use of the IEP document.

- In general, the time and paperwork burden of IEPs continued to lessen as people devised shortcuts or accepted the IEP process as a routine part of their jobs. Complaints were usually heard only in LEAs where new procedures that had just been imposed were perceived as burdensome.

- In general, parents continued to make few substantive contributions to the school-level decisionmaking process regarding their children. Although some LEAs made changes that increased parent participation, parents continued to make few substantive contributions.

Least Restrictive Environment

Last year, we examined the continuum of alternative placement settings available to handicapped students and the specific ways that the mutual exposure of handicapped and nonhandicapped children was being accomplished at the school level. This year, we continued to investigate these topics, focusing on changes since last year in the continuum of placement options and mainstreaming activities.

Changes in the Continuum of Placement Options

Last year, we reported that a wider continuum of placement options was available to mildly handicapped students (e.g., SLD, EMR) than was available to the more severely handicapped (e.g., SED, TMR, SMR). This year, we investigated any changes in the continuum of options available to handicapped students. We defined a change in the continuum from a system perspective; that is, a continuum was considered to have expanded if an additional program or setting option was added for a particular handicapping condition. We did not consider the continuum changed if more of the same types of program were added, or if shifts in eligibility criteria resulted in children being served in different options.

In general, we found the same situation as last year; in 1980-81 there was still a wider continuum of placement options available to the mildly handicapped than to the severely handicapped. The general pattern across

the majority of the LEAs visited also showed no expansion in the continuum for special education students. However, in several sites we did observe some exceptions, which included at least three different types of expansion:

- Expansion in the continuum of options available to the severely handicapped (SED and, to some extent, TMR), primarily at the high school level.
- Expansion in the continuum of options available to the mildly handicapped at the elementary level.
- Expansion in the continuum of vocational education options at the high school level.

In addition, in several sites we saw expansion in regular education options, that can serve borderline students not eligible for special education or those transitioning out of special education.

Below, we discuss types of expansion observed in special and regular education options. Expansion in the continuum of vocational education options will be discussed in Section IV.

Options for the Severely Handicapped

The greatest expansion of a continuum in special education options appears to have occurred in programs for the severely handicapped (i.e., for the SED and, to some extent, TMR). The expansion for SED students was as expected; it seemed that several districts were coming to grips with the SED problem, because these students cannot easily be ignored. A few sites are exploring the edges of the state of the art to find program alternatives in which to serve SED students better.

In particular, two progressive districts expanded their continuum of program options for SED students. Over the past few years, one district has developed a range of placement options for SED students (including off-campus programs as well as part-time placements). In 1980-81, this district added an option for intermediate SED students, which entails more

intensive supportive services than other existing options. This intermediate SED placement option serves seven fourth- to sixth-graders, and is staffed by two teachers and an aide. Intensive support services to these children include social work services, psychiatric consultation, prevocational services, and adaptive physical education. The other LEA increased its continuum of options to SED adolescents by starting a cooperative program with a community mental health agency. This program is an alternative to its existing out-of-county and institutional placements. The LEA provides the educational component of this program, and the mental health agency provides the psychological component.

Both of these districts were also planning to further increase their continuum for SED students in 1981-82. In the first site, a high school district provided release time this past year for a special education teacher to plan an alternative SED program for high school students who need more structure and containment. The goal is to better serve students whose needs are not being met. After visiting various alternative programs and talking with teachers and program directors, the teacher proposed an off-campus model with therapeutic intervention to the school board. Despite local fiscal conservatism, the LEA special education director planned to begin this program in 1981-82. The second LEA planned to further refine the continuum of options available to the SED population by reducing itinerant services, increasing resource classes, and placing new self-contained classes at school sites.

In contrast to these sites with plans for expansion, LEA administrators at one site planned to drop the SED alternative high school that was funded under PL 94-142, because of anticipated funding cutbacks. This program loss will significantly reduce the options available to SED youngsters in 1981-82.

As mentioned above, we also observed at least one expansion of the continuum available to TMR (and more severely retarded) individuals. In a district that in 1979-80 created a new placement option to accommodate high-functioning, elementary-aged TMR children, a new option was opened this past year for high-functioning, high-school-aged TMR students. This option

for "gifted" TMR students, located at a high school, was instituted in response to advocate pressure to do more mainstreaming of the severely handicapped. Prior to 1980-81, the only option available for these students was special schools within the LEA. This expansion of the continuum may be part of the trend we have seen toward serving the severely handicapped in age-appropriate settings; however, in other sites where classes for the severely handicapped had been moved to high school settings, these new classes tended to be the only options available to these youngsters and thus did not represent an expansion of a continuum.

Options for the Mildly Handicapped

Although not very common, we saw at least two instances where the continuum of options had been expanded for the mildly handicapped at the elementary level. However, these were not major changes; they involved increased flexibility in existing programs, rather than the addition of new programs. In one district, a slight change in the range of options for the mildly handicapped at the elementary level resulted from the implementation of a new state funding model. The biggest change was that the LEA was no longer restricted to either a resource room placement or a self-contained setting. The hours spent by a student in a special education classroom could be more flexible; thus, this LEA theoretically could better address the individual needs of students. For example, we visited one classroom organized as a combination resource room and self-contained class. Special education students began each day in the regular class, at least for opening activities. Then, depending on individual needs, they spent varying amounts of time in the special education class. Students returned to the regular class for the last period of each day. This model would not have been acceptable under the old funding system; this type of class was tried on an experimental basis in 1979-80, and was a bona fide option this past year.

In another LEA, we saw an expansion of the continuum, although not on a districtwide basis. During 1979-80 in this LEA, schools had either itinerant or resource teachers; in the middle of that year, some of the

schools eliminated the resource teachers in favor of self-contained classes. However, this past year, at least one school had both self-contained class and resource room options for SLD students. Because SLD students were typically served in their home schools, this change, in effect, expanded the continuum of services available to at least some SLD students in this district.

Options in Regular Education

We also visited some LEAs where options added in regular education could serve borderline students not eligible for special education. In addition, these options could be used to aid students in the transition out of special education.

At the elementary level in one LEA, a regular education program had just been implemented for children in grades K-3. This program, instituted in response to new minimal competency testing requirements, was not for special education students but for students with possible learning problems. All children are tested by diagnosticians in this program; and if their learning problems are severe enough, they are referred to special education. Children with less severe problems are placed in this special remedial program.

In another LEA, new basic skills classes were established in the high school this past year. These classes were started to serve students who do not qualify for special education, but who are not capable of functioning in the low-track high school classes. In addition, these classes serve students who are transitioning out of special education.

Changes in Mainstreaming Activities

Last year, we observed continued movement toward greater individualized programming through the mutual exposure of handicapped and nonhandicapped

children. This year, we found that this pattern continued. Overall, we found no large change in the amount of mainstreaming, at either the elementary or secondary level. However, new strategies to facilitate mainstreaming continued to be developed, and regular teachers were continuing to accept their expanded role vis-a-vis special education students, thus making mainstreaming easier to accomplish.

Changes in the Amount of Mainstreaming

At each of the 16 LEAs we visited, mainstreaming activities continued on both group and individual bases. At the elementary school level, the overwhelming trend was no change in the amount of mainstreaming. In fact, we found changes in the amount of mainstreaming in only two LEAs: in one, the amount of mainstreaming increased; in the other, it decreased. The changes in these two districts were the result of internal factors idiosyncratic to each LEA.

One of the two districts lacked enough elementary SLD classes to handle its expanding elementary SLD population. This past year, the SLD classes were used more as "lab" settings; that is, SLD students spent less time in the SLD classes than in the previous year. In addition, more use was made this past year of the "indirect service" option, where children are served with an IEP in the regular classroom. These changes resulted in a greater amount of mainstreaming for children at the elementary level. In general, respondents in this district felt that this practice did not affect children negatively, because those students who needed more time in the SLD labs could stay there all day. However, some school-level personnel acknowledged that this change might not be totally appropriate. They felt that some children needed more time in the SLD classes, although this need had to be balanced against the problem of isolating elementary school children from their nonhandicapped peers.

In a small, conservative district, a change in program options resulted in a decrease in the amount of mainstreaming at the elementary level.

Personnel in this LEA generally felt that self-contained options were appropriate for children in the lower elementary grades. Thus, this past year, the part-time EMR class for the second and third grades was changed to a full-time EMR class. The EMR teacher commented that children were being served better since the EMR class is full-time. She felt that the children get more individual help, and that there was "too much going on" in the regular class for her children to benefit from being there.

At the high school level, although we saw no significant changes in the amount of mainstreaming in the majority of the study sites, there were more changes than at the elementary school level. Most of these changes related to increasing efforts to place special education students in regular vocational education options. In at least three sites, this increased effort resulted in a greater amount of mainstreaming at the high school level. This type of mainstreaming was, in some sites, facilitated by new boundary-crossing personnel (see next subsection), whose job was to establish more formal means of coordination between special education and vocational education.

Except for these areas of increased vocational mainstreaming, there was minimal change in the amount of mainstreaming at the high school level. We did, however, also see the continuation of the trend of putting severely handicapped high-school-aged individuals in age-appropriate settings. For example, one large urban site, which in 1979-80 had moved a class for the severe and profoundly handicapped into a high school, moved a TMR class into a high school in 1980-81. TMR classes also were placed in high schools in two other LEAs this past year. Although TMR students typically were not mainstreamed, their placement in age-appropriate settings provided more opportunities to increase their exposure to their nonhandicapped peers.

Changes in Mainstreaming Strategies

Although, overall, we saw no major change in the amount of mainstreaming in the LEAs visited, we generally found that mainstreaming was

more accepted and easier to accomplish this past year, compared with 1979-80. In part, this change happened because districts over the last few years have devised new strategies to facilitate mainstreaming. For example, last year we reported evidence that mainstreaming was facilitated by aides and boundary-crossing personnel,* as well as by a number of strategies such as the use of notebooks and individual assignment sheets. This year, we also observed several new strategies designed to facilitate mainstreaming, as follows.

In a conservative district, a special education coordinator (hired last year) implemented several strategies designed to facilitate mainstreaming at the elementary level. Each special education teacher was given an aide to help with mainstreaming activities. In addition, each special education student in a self-contained class was automatically put on a regular classroom teacher's class list so that the teacher's class list would not exceed its maximum limit in the event that mainstreaming became an appropriate option for that particular student. Although there was no funding incentive to mainstream, this practice ensured that a chair in the regular classroom was available if teachers wanted to mainstream a special education student.

In another district, a boundary crosser developed a new mainstreaming strategy for the elementary level that defined the grading and instructional responsibilities of both the regular and special education teachers. Children could be mainstreamed under two options: "competitive" and "noncompetitive" mainstreaming. If a child was mainstreamed into a regular classroom in a competitive mainstreaming role, the regular teacher graded the child on objectives mutually agreed on with the special education teacher and written into the IEP. The objectives (academic or social) were detailed, as were the teaching and reinforcement responsibilities of the

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*The role of boundary crossers is to minimize the barriers associated with the organizational boundary between regular and special educaton.

regular and special education teachers. If a child was mainstreamed into a regular classroom in a noncompetitive role, the special education teacher graded the child's progress on the outlined IEP objectives. Previously, special education teachers had been responsible for grading all mainstreamed children. Now, if a child was mainstreamed and judged, at least somewhat, on the same basis as other children (competitive mainstreaming), the regular teacher was given the responsibility for grading and could view his or her role as more than a babysitter. There were plans to implement this strategy at the high school level for 1981-82.

Mainstreaming was also facilitated in at least two other sites that added boundary-crossing personnel to increase coordination between special education and vocational education at the secondary level. These new personnel (such as the vocational education coordinator and the vocational advisor) were facilitators of mainstreaming in the sense that they facilitated the accessibility of regular vocational options for special education youngsters.

Another high-school-level strategy, although not new, was very interesting. A resource room teacher in one district became frustrated several years ago with the haphazard way that mainstreaming was being carried out (i.e., special education teachers begging regular education to take students when no one knew whether the students were competent enough to cope in the regular class). She designed a system to try to rectify this situation. First she surveyed every regular teacher of each high school course to find out what minimal skills were necessary for students to function in each class. Then she ranked each course on a scale of one to five--five being the most difficult (e.g., Advanced Placement Chemistry)--and designed an informal "crucial skills test" that she used to determine whether students were ready to be mainstreamed into certain classes. For example, when a student wanted to be mainstreamed for typing, she checked the skills the typing teacher required, and then assessed the student to see how close he or she came to meeting the requirements. She either showed the student specifically what skills had to be mastered before he or she could be successful in that class or, if the class seemed totally inappropriate,

recommended another one. If a student came close to meeting the entry requirements of a course, the resource teacher would see whether the regular teacher was willing to make some adaptations. At that point, the resource teacher had a fairly clear idea of what adaptations needed to be made, and teachers were usually open to doing so because they understood exactly what she was talking about. She felt that this system did not encourage regular teachers to set standards that excluded special education students, but rather helped her to make appropriate mainstreaming choices for students. This system worked best with the mildly handicapped resource room students who generally could get by in the regular program with minor adaptations. This past year, the resource teacher was asked to help the vocational education teachers develop a similar system to help identify the most appropriate vocational classes for special education students.

Summary

The following are the major findings of our investigation of provisions regarding least restrictive environment during the 1980-81 school year:

- In the majority of LEAs, no expansion in the continuum of placement options for special education students occurred. As was true during 1979-80, there was still a wider continuum of placement options available to the mildly handicapped, although there was some expansion of program options for the more severely handicapped. Finally, several sites increased regular education options that could serve borderline students not eligible for special education.

- The movement toward greater individualized programming through the mutual exposure of handicapped and nonhandicapped children continued. Overall, however, there was no change in the amount of mainstreaming. On the other hand, mainstreaming of special education students was generally more accepted and easier to accomplish, in part because of the continued development of new strategies to facilitate mainstreaming (e.g., use of aides, new grading strategies, new boundary-crossing roles).

Changes in Personnel, Roles, and Inservice Training

In the first part of this subsection, we describe the overall change in the personnel who constituted the special education delivery system at the school level for 1980-81. Next we discuss the "boundary crosser" role at the school level, followed by a description of other new roles that have been developed, as well as traditional roles that have been adapted, in response to various local and outside influences. Finally, we provide an update on changes in inservice training.

Changes in Personnel

The limited expansion of special education programs and services observed this past year in the study sites resulted in few additions of teachers to staff the new classes or expanded programs (described in Section II) and in the hiring of few personnel to deliver related services. Because most districts were unable to hire additional special education personnel, primarily because of budgetary constraints, many teachers and related service personnel (i.e, the existing work force) had to take on additional responsibilities and/or workloads to try to maintain appropriate programming to handicapped students within these constraints.

The Boundary Crosser Role

Over the past 2 years, we have reported on the role of personnel, whom we call boundary crossers, whose job it is to minimize the organizational barriers to implementing the provisions of PL 94-142. At the school level, boundary crossers are responsible for bridging the gap between special education and regular education, especially in areas that require some type of coordination, such as in mainstreaming and IEP development and use. For example, the role of the resource specialist, created as part of California's Master Plan for Special Education, was designed to provide individually appropriate instruction for learning-handicapped children at

both the elementary and secondary levels. The resource specialist's role is part instructional and part coordinative. In addition to instructional responsibilities, resource specialists are required to provide services such as inservice training for school staffs, consultation for regular classroom teachers, and coordination of placement and IEP meetings.

Last year, we reported that 10 sites had boundary crossers, and we described how these personnel functioned. These boundary-crossing roles existed at both the elementary and secondary levels, although they were far less prevalent at the secondary level. This year, we found no change in the way these personnel operated at these same sites. On the other hand, we did find an increase in the number of boundary-crossing personnel in these 10 LEAs, primarily because of increased coordination between special education and vocational education at the secondary level. At the elementary level this year, we discovered very little change, if any, in the number of boundary-crossing personnel.

The boundaries to be crossed to implement the intent of PL 94-142 at the secondary level are more numerous than at the elementary level. Last year, we reported that although only a few sites had formal secondary-level boundary-crossing personnel (e.g., tutor-counselor, resource specialists), more than half had established informal coordination between special education and vocational education to provide improved programming for special education students. Examples of these informal mechanisms included a work experience coordinator, who (as part of his duties) coordinated special education students' instructional programs with their work experience, and a vocational placement specialist, who spent some of his time coordinating the various components involved in vocational programming of special education students (e.g., coordination among employers, regular and special education teachers, and the students themselves). This year, we found that these informal mechanisms of coordination between special education and vocational education continued to operate. In addition, in three sites, new boundary-crossing roles were established to provide more formal means of coordination between special and vocational education. These new roles are described below.

Vocational Education Coordinator--The role of the vocational education coordinator was developed by one LEA in an effort to provide more vocational opportunities for its special education students. This position, paid for through vocational education 10% set-aside funds, was the outgrowth of an agreement between the special education department and the vocational education department on how vocational education was to carry out its mandate to serve special education students. The vocational education coordinator's primary focus is to assist self-contained special education students, and his time is spent (1) gathering assessment data to be used in placing special education students in vocational programs, (2) seeking out receptive vocational education teachers for student placement, (3) acting as a liaison between vocational and special education (he can provide assistance to vocational education teachers such as tutoring and counseling of special education students, and providing inservice training to vocational teachers), and (4) finding jobs for students.

Vocational Rehabilitation Counselor--In one large district, which has had previous success with boundary-crossing personnel, the new role of vocational rehabilitation counselor was created this year. The LEA perceived a need to strengthen the connections among special education, vocational education, and all postsecondary options available to special education students (e.g., employment, college, Department of Vocational Rehabilitation). Vocational rehabilitation counselors are itinerant special education personnel (not Department of Vocational Rehabilitation personnel) whose sole responsibility is to special education students, but they are funded out of the regular vocational education budget. Vocational rehabilitation counselors assist special education students in (1) planning vocational programs and making career choices, (2) finding employment while still in school, and (3) making the transition from school to postsecondary employment. Although these counselors serve all age ranges of special education students, this past year they focused primarily on 12th-grade handicapped students to link them with postsecondary options.

Vocational Advisor--A third LEA adapted this role, which had provided informal coordination between vocational and special education, to provide a more formalized mechanism of coordination. The vocational advisor now devotes the entire day to job placement and follow-up, counseling, and coordination of special education student programming.

Thus, overall, we found that the number of boundary-crossing personnel increased slightly at the school level this year because new roles were developed, primarily at the secondary level. These new boundary-crossing roles were created in three sites that had previous successful experience with boundary crossers. The LEAs concentrated their new coordination efforts, through the means of these new boundary-crossing personnel, on increased cooperation between special education and vocational education. Although the establishment of these new roles resulted in improved vocational programming for some special education students, most LEAs in our study were just getting started in this area and much more needed to be done to improve remaining coordination barriers between the special and vocational education systems.

Other New Roles

In addition to boundary-crossing roles, nine other new school-level or LEA-level roles or functions became evident during the 1980-81 school year. These new roles were created in six LEAs (five of which are large urban or suburban districts), in response to various local factors and outside influences. The local factors included discipline of special education students, inappropriate changes in placement, decentralization of administrative responsibility, and effective monitoring of students in private placements. Outside influences (e.g., SEA monitoring and court cases) accounted for half of these 9 new roles, which were created to deal with bilingual assessments, services to nonpublic school students, and program development for SMR students.

One new role, for example, that of a life skills supervisor, functions primarily at the school level. A large urban district developed this role in response to pressure generated by a court case concerned with the quality of SMR programming. The life skills supervisor is responsible for the overall development of the community life skills component of the new model SMR programs initiated by the district. He or she also assists special education teachers through coordination of services to students and provision of additional assessment data.

LEAs were able to accommodate these new roles by redistributing resources (i.e., state and local special education funds), allocating federal funds received through PL 94-142 and PL 89-313, and increasing the responsibilities of current personnel. Most of these new roles were related to changes at the LEA administrative level and thus are discussed in Section II. For example, the roles and functions of a "data review committee" and a "special admissions team" are described in that section.

Changes in Inservice Training

Overall Changes

Last year, we reported that there was little change in the amount of inservice training or in the priority attached to it. On the other hand, there were indications that training was better coordinated and addressed more substantive issues than during past years. A number of factors appeared to have facilitated the move toward more relevant inservice sessions. These included: (1) the addition of school-level personnel who could provide training on formal and informal levels, as well as provide support to regular education personnel; (2) the creation or expansion of inservice coordinator roles; and (3) adequate coverage of procedural matters in past sessions.

Although we found no dramatic change in the amount of inservice training this year, about half of the study sites increased or decreased (to the point of no special education inservice in two LEAs) their levels of inservice training during 1980-81. These changes were attributed to local factors (such as lack of money or more pressing priorities) and SEA influences (such as additional funding provided to LEAs for staff development).

There was little change this past year in the level of relevancy of inservice training (i.e., sites continued last year's efforts of more substantive and better coordinated training). Although inservice relevant to local needs provided an incentive for participation by target groups, there continued to be a need for other incentives to maintain high levels of participation. LEAs continued to provide teachers with substitutes, to pay for inservice time, and to give college credits to encourage teachers and other personnel to participate in inservice training. Some districts still required specific levels of inservice training for salary increases.

We did, however, find some signs that additional emphasis was being placed on this past year on the topic of vocational education as it affects special education students. This change was consistent with the increased emphasis on career or vocational education for special education students described in other sections of this report. Examples of some preliminary efforts made by six LEAs in the direction of including the topic of vocational education in training sessions follow:

- Three sites had special education personnel give presentations (on topics such as mainstreaming) to vocational-technical and other vocational education staff.
- Two sites included vocational staff on special education inservice training committees, and held special education inservice sessions directed at special education vocational teachers "to help them see the whole picture."
- One LEA contracted with a university to design comprehensive staff development materials (e.g., vocational evaluations, defining skills for successful functioning in any type of vocational class) for all vocational and special education personnel involved in program

development and decisionmaking. The contract laid the groundwork for future cooperative inservice training and curriculum development between vocational and special education.

Other Factors Related to Inservice Training

This year, for the first time, we also inquired about three factors concerning inservice training: needs assessment practices, parent training, and the use of PL 94-142 funds for staff development.

We found that every LEA in our study at some time has conducted an inservice needs assessment, which has ranged from a formal survey to less formal practices such as brainstorming or teachers' personal requests to their supervisors. However, there was no clear evidence that the form of the needs assessment (i.e., formal or informal) had any direct impact on the degree of relevance of inservice training.

Parent training was mentioned in three sites as a target for inservice training. Sessions were organized by special education staff and parent groups and were aimed at increasing parental awareness and knowledge regarding special education. However, in general, parent participation was not exceptional (i.e., the same interested parents came while the majority did not participate). As a result of this low turnout of parents, one district planned to concentrate future parent training efforts at the school level, which might provide sessions more relevant to individual school needs and therefore be perceived as more relevant by individual parents. In addition to local efforts, one SEA added a new program consultant this year to coordinate statewide activities related to parent awareness, information, and training, which may have an impact at the local level in the future.

About half of the LEAs used PL 94-142 funds to supplement staff development activities. For example, one LEA continued to use PL 94-142 dollars to provide some inservice training for regular education staff. As part of this effort to increase awareness among regular educators, principals and guidance counselors attended special education meetings such

as those sponsored by the Council for Exceptional Children, the SEA, and the district. Finally, with anticipated cutbacks in PL 94-142 funds, one district planned to decrease its inservice training budget next year (at the request of the SEA) in order to use its PL 94-142 funds to preserve the level of direct services to students.

Unmet Needs in Inservice Training

As was true in past years, despite improvements in the nature of training provided, there continued to be a need for more inservice training. Unmet needs, as noted by respondents, still included the following:

- A need for increased substantive training for both regular and special education personnel regarding working with handicapped students (e.g., training on instructional strategies, classroom management, child identification).
- A need for information on how to work with students who do not qualify for special education services (e.g., the "slow learner").
- A need for a comprehensive orientation on PL 94-142 procedural requirements such as referrals, due process, and IEPs for those groups that have not received any training regarding special education (primarily regular education teachers and administrators).

Changes in SEA Involvement in Personnel Development

In the 1979-80 school year, we reported that states used various mechanisms (e.g., regional resource centers, state grants, requirements that LEAs spend a percentage of their PL 94-142 flow-through funds on inservice training) to implement their comprehensive systems of personnel development. SEA-sponsored training was generally viewed by respondents in most study sites to be of limited utility because of its general nature (i.e., topics were not relevant to the specific needs of individual LEAs, and LEAs had difficulty coordinating with the SEA system). Little changed in 1980-81 in the majority of states with regard to the mechanisms used

statewide to implement personnel development or in the frequency with which LEAs took advantage of SEA training. There were, however, two significant exceptions, which are described below.

Two SEAs, through changes in legislation and funding mechanisms, influenced the level or quality of inservice training in their LEAs this past year. The first state included the requirement in its new special education legislation that LEAs provide inservice training to all regular education teachers who serve special education students. The regulations state:

> Each district, special education services region, and county office shall ensure that all regular classroom teachers who provide services to individuals with exceptional needs receive the equivalent of at least one day of training each year relating to the needs of such individuals.

LEAs have responded both favorably and unfavorably (e.g., concerns about planning and resource requirements) to the new regulation and have selected various means to implement this training. For example, districts have promoted inservice modules at the school level, district-level workshops and speakers, and greater involvement of regular teachers in IEP meetings. It remains to be seen whether this additional training will increase the quality of LEA inservice training.

The other state made legislative changes this past year not only in personnel development requirements, but also in how funds were allocated to this function. A new state law was passed that requires educators to receive 15 hours of inservice credit each year in order to maintain their certification. This required inservice training can involve local inservice sessions, university courses, attending state meetings, and so forth. Additional funds were allocated to LEAs to implement the new law. The SEA also changed its allocation procedures for funds to implement the state's comprehensive system of personnel development. In 1979-80, SEA PL 94-142 discretionary funds were allocated to regional service centers for the provision of inservice training to LEAs. In 1980-81, discretionary funds were merely funneled through the regional centers, thus allowing LEAs

to run their own special education inservice training. The results of these changes had been very positive, according to LEA personnel in the study sites in this state. Because the SEA had allocated additional funds to the LEAs to implement the new law, the LEAs were able to provide more inservice training than had been possible previously. In one LEA, for example, special education inservice was provided to regular education teachers for the first time. Respondents in this same district generally felt that the inservice training sessions were more pertinent and more convenient than the regional service center's prior sessions. The 15-hour requirement also encouraged a greater level of participation in special education inservice sessions.*

There were some indications across the study sites that state-level changes may affect the level of LEA inservice training in 1981-82. For example, one SEA, whose system of staff development requires its LEAs to spend a certain percentage of their PL 94-142 flow-through funds on inservice training, planned to reduce this percentage from 10% to 5%, in anticipation of federal cutbacks in PL 94-142 funding levels.

Summary

The principal observations about changes in personnel, their roles, and inservice training during the 1980-81 school year were the following:

- Contrary to last year, there was limited special education program expansion; therefore, few additional education personnel were hired to staff new programs and to provide related services.

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* Attendance at inservice training is currently voluntary in some LEAs because of union contracts. The new state law in essence makes inservice mandatory; therefore, teacher unions have been working to provide for additional teacher input into the kinds of inservice training offered to meet the 15-hour requirement.

- The number of boundary-crossing personnel, who are responsible for bridging the gap between regular and special education, has increased slightly through the development of new boundary-crossing roles. These new roles were created primarily at the secondary level to provide coordination between special education and vocational education.

- Other new roles or functions were created this year to deal with various local and outside factors, such as monitoring, court cases, and concerns over discipline of special education students.

- The amount of inservice training did not change significantly in the majority of study sites. However, several LEAs increased or decreased their level of special education inservice training because of local or state influences.

- If inservice training is relevant to perceived needs and interests personnel will participate, but it was reported that other incentives continue to be needed (e.g., pay, substitutes to cover classes, credit for personnel development).

- More collaborative training initiatives (e.g., between special and vocational education at the secondary level) were getting under way, particularly in areas emphasizing career preparation for handicapped individuals.

- Two SEAs were requiring or providing for more inservice training at the local level. These changes were made through changes in legislation and funding.

- Needs in the area of inservice training remained the same as last year because, overall, few significant changes were made this past year. Training needs include more substantive training for regular and special education personnel who work with special education students, increased orientation to special education and its requirements for all regular education staff, and training for regular education staff on how to deal with student problems not under special education jurisdiction, such as slow learners and behavior problems.

IV SECONDARY LEVEL: PROGRAM OPTIONS, GRADUATION REQUIREMENTS, POSTSECONDARY OPPORTUNITIES

In this final findings section, we discuss changes at the high school level and issues related to secondary students. First, we describe changes in high school program options, particularly with regard to vocational opportunities for special education students. Next, we discuss the impact that graduation requirements and minimal competency testing have had at the LEA level this year. We then present findings concerning the transition of handicapped students from high school to continuing education, employment, or postsecondary training, or to becoming clients of caretaking or other human service agencies.

High School Program Options

Last year, we found that although a wide range of program options (e.g., resource rooms, self-contained special education classes, work-study programs, regular vocational education classes, vocational technical centers) existed across the study sites, rarely did a comprehensive range of options exist within a given LEA. Moreover, we noted that the nature of a high school student's program was largely determined by the resources available within the LEA context, which varied substantially across these sites.

Although our findings in 1980-81 were essentially the same, we did investigate in more depth the goals of secondary schools for different types of handicapped students. For the most part, the LEAs in the SRI study believed that their high school programs should prepare special education students for continuing education, postsecondary training, or employment

(including sheltered workshop settings for TMR and SMR students). Although six LEAs set the employability goal for all special education students, the majority of the districts tended to be unclear about goals for SLD students. Generally, SLD programs had a mixture of academic and vocational goals. For example, in one large district, some people thought that it was important to promote the "vocational route" for SLD students, while others thought that parental expectations, which could include college preparatory work, should influence decisions about program options to a greater extent. A special education director in another site commented about the intent of high school: "By the end of 12th grade, kids should have a saleable skill, even if they're going to college." Finally, in a third district where about 90% of all high school students went on to 2- and 4-year colleges, most SLD students in the resource program were academically oriented and did go on to college.

Generally, program goals were clearer for the EMR and the more severely handicapped high school population than they were for the SLD population. Goals for these students reflected an orientation toward preparation for the world of work and responsible citizenry. LEA and school-level personnel expressed expectations that EMR students should become "productive members of society" and that the major goal of high school for these students was "to make taxpayers, not taxtakers of them." Finally, for the more severely handicapped (TMR, SMR) students, LEAs tended to focus on prevocational training, self-help skills, and independent living skills, and to prepare high school students for employment within sheltered workshops or for postgraduation services from other human service agencies. Although more severely handicapped students often remained in school until the maximum legal age for leaving, there were few programmatic differences for these students between the ages of 18 and 21.

Overall, more program options continued to exist for the upper range of handicapped students, primarily SLD, higher functioning EMR, and SED students with socially appropriate behavior. Although this year we saw three districts in which TMR and SMR students were placed in high schools with their age-appropriate peers, these self-contained settings were the

only program options for these students. Moreover, in slightly over half of the study sites, TMR and SMR students were served in separate facilities, rather than in public schools.

As described in Section II, LEAs focused on filling service gaps in their secondary-level programs this past year. Changes in services to SLD and SED students were discussed in Sections II and III; efforts directed at vocational education program gaps are presented below.

Vocational Education Program Options

In over half of the LEAs visited, vocational education programmatic gaps were being addressed in 1980-81. While some districts expanded services within their existing vocational education programs, other LEAs focused their efforts on creating new or modified roles or procedures to better coordinate vocational education services for special education students.* A few districts sought to improve the match between student skills and the specific requirements of jobs within the local community, in order to help special education students become more competitive in the job market. In some districts, regular vocational education administrators, who historically have operated separately from special education, facilitated special education administrators' efforts this past year.

Program Changes

Most of the changes in vocational education programs for special education students this past year related to mildly handicapped students

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* One factor influencing these efforts in locally declining enrollment in the regular education population, which means that vocational program staff and others have time to devote to the special education population.

(high functioning SLD and EMR, mild SED), often because the mildly handicapped population represented the largest proportion of the total special education population in a district. As one LEA special education coordinator explained the district's strategy: "Our strategy was, 'Here are most of the kids in the most need--let's serve them.'"

One large district added 16 special education vocational education classes in 1980-81, primarily to serve mildly handicapped students. Because the LEA's vocational education department administers all vocational education programs in the LEA, the special education department was involved actively with the vocational education department to plan for this program expansion. The district conducted a "job market analysis" to identify the types of jobs available in the community. Professionals in the labor force were interviewed to find out which business areas were most likely to have job openings that could be filled by special education students. (Through such formal and informal networking, for example, local hotels agreed to guarantee either paid or unpaid job placements). The program areas that were included this year were selected from a pool of possible options by applying the following criteria: (1) that there were community jobs available in the vocational program area and (2) that there was the possibility of setting up training at the employers' sites. As a result of this job market analysis, classes were designed to teach special education students entry-level skills in various fields (e.g., clerical, cabinetmaking, food services, hotel/motel services, convalescent hospitals, landscape maintenance).

Increased cooperation between LEA departments of vocational education and special education facilitated programmatic change in another large urban district. Vocational assessment and career counseling for special education students were virtually nonexistent throughout this district. Students generally decided for themselves what vocational program options they wanted. However, to help address the need for better vocational assessments, two new vocational education pilot programs at the 10th-grade level were begun to work with special education students in home economics and shop. In addition, one vocational technical center published a series

of guidelines this past year to assist special education teachers in advising their students about the various vocational programs at the center. These guidelines provided profiles of the general, physical, and specific attributes of "a potential student who will most likely complete each vocational course successfully."

Programmatic changes also occurred in three other sites. One district provided additional vocational training to higher functioning EMR students so that they could get jobs in the areas for which they were training (e.g., welding, clerical, custodial, auto mechanics). To further assist these students, the LEA hired a former EMR teacher to act as a job placement specialist. Using 10% set-aside funding, another district started two new programs, primarily for 9th-grade SLD and EMR students. One program was aimed at career exploration to help children narrow their vocational choices before they reached high school; the other provided some skills training to 9th-grade EMR students. Finally, the work-study program in a rural district expanded slightly to include services for SLD and SED students, as well as for the traditionally served EMR students.

Changes in the Coordination of Vocational Education Services

A few districts sought to improve the coordination of vocational education services for special education students. For example, one LEA implemented a new staff role this past year that had been operating on a pilot basis in Spring 1980 . The purpose of this new role, vocational education coordinator, was to open up more vocational education placements for special education students. The coordinator worked mainly with EMR students this first year, because they needed the most assistance in participating in and benefiting from the regular vocational education classes. Although student selection was based on "potential for success," thus limiting opportunities for some handicapped students, the vocational education coordinator reported that he had increased his caseload from 18 students in Spring 1980 to 36 students this past year.

Another district adapted a role (vocational advisor) that had provided information coordination between vocational and special education to now provide a more formalized coordination mechanism. The vocational advisors found job sites for high school special education students, followed up on student work performance, provide career counseling for individual students, and coordinated mainstreaming activities, especially those involving vocational training classes. Although this LEA already had a sophisticated vocational assessment center that tested all special education students at age 16, the assessment results were not always used optimally. This past year, the vocational advisors made certain that the vocational assessment information was integrated with other data when decisions were made about job placement. An increase in the number of special education students in the regular vocational training classes was attributed to this successful "boundary crosser" role, as well as to the impact of declining enrollment on vocational education (i.e., vocational education needs students to keep teachers and programs).

Match Between Student Skills and Local Job Market

Earlier in this subsection, we described how one LEA used a "job market analysis" approach in planning to better match the skills of the district's special education students with the needs of the local job market. Here, we present examples of such efforts in at least from four other LEAs. Last year we described one LEA's vocational technical center and noted a variety of local contextual factors (e.g., heavy industry, good school-community-business relations) that contributed to the success of the center's vocational education program. This past year, this district further refined its program through the use of a Title IV-C grant. The district conducted a survey of local employers to check out available jobs and to match special education students' skills and interests with these jobs. Changes in the vocational training program will be made in 1981-82 to reflect single-skill training to a greater extent; that is, the curriculum will be broken down into more specific skills within each program area.

The match between student skills and jobs available locally was also of concern in another LEA. Although more special education students had been enrolled in the vocational technical center during the past 3 years, there had been no successful placement of these students in employment related to their vocational/technical training. Although about 80% of students found some kind of postsecondary employment, district administrators questioned what criteria should be used to measure program success for special education students. For example, some students in the auto mechanics program could perform individual tasks like tire mounting, but could not complete all of the other program area requirements.

Although not doing so for the first time, in 1980-81, vocational technical centers in at least two other districts attempted to better match student skills with local job markets by using competency-based curricula that specify required entry-level job skills within each programmatic area. In one district, the curriculum for each program was broken down into specific skills, which were then organized into "learning packs." This approach permitted a student to work on specific skills individually, at his or her own pace, guided by detailed instructions in a packet of material on that skill. The curriculum could be modified for special education students so that they could complete only part of the total competencies, if necessary. Vocational educators noted that students had a record of the specific competencies they had demonstrated within each program; thus, employers can clearly assess graduates' entry-level job skills.

Finally, in one other district, located in an urban area, the majority of handicapped students probably leave the public schools without appropriate vocational training or work-related skills. However, students who participated in programs at two vocational skills centers had the most appropriate training available to them. The centers provided training in "vocational clusters" (e.g., cosmetology), which broke down skills into specific competencies related to specific job-entry skills. Thus, two students in the same vocational cluster could progress at their individual rates and achieve different levels of job skills (e.g., shampoo person vs. beautician). A computerized system kept track of what each student had

mastered, and students left the program with a certificate of achievement listing these competencies.

Remaining Challenges in Vocational Education for Special Education Students

Despite LEA attention to vocational education gaps for special education students this past year, problems remained in the secondary programmatic area. In terms of program options, it remained true in 1980-81 that work-experience/work-study programs (emphasizing work-readiness skills and on-the-job experience) most often served EMR students and sometimes SLD and SED students. Regular vocational education classes within comprehensive high schools and vocational technical centers, designed to offer specialized vocational or career training (e.g., auto mechanics, building trades, cosmetology, small engine repair, child care), continued, in general, to be geared to the upper range of special education students (mild SLD and SED, and a limited number of higher functioning EMR students).

Although over half of the LEAs we observed were trying to improve components of their vocational education service delivery systems this past year to better accommodate special education students, rarely did all of the system components link together smoothly as yet. The various components can be summarized as follows:

- Vocational assessment, career counseling, and vocational placement
- Curriculum or equipment modification and support services
- Training of vocational education teachers
- Job placement/transition to the world of work.

Although some LEAs addressed vocational assessment and career counseling this past year, they remained weak areas at the majority of the study sites. Decisions about vocational placement often were made on the basis of teacher recommendation or student desire. For example, in one LEA, EMR

students just selected the classes they wanted from a list of vocational education classes.

Last year, we reported that we found increasing attempts to adapt vocational training programs to handicapped students and to reduce teachers' resistance to the inclusion of special education students. This year, we found that curriculum acommodations or equipment modifications and support services for special education students tended to occur most often at vocational technical centers. For example, vocational centers in at least five districts had such services, as follows.

In one large LEA, there were special education teachers (for SLD, SED, and EMR students) on the vocational technical center's staff to teach academic classes and to provide support to regular vocational education teachers (e.g., test accommodations). In addition, a special learning center, staffed by teachers and aides, was available to provide individually tailored programs for special education students. Another large district had a special education coordinator and aides to support special education students in its vocational skills centers. In yet another LEA, reading and math labs were available at the area vocational school for both regular and special education students who needed assistance. Finally, two other districts in two states had resource personnel available at their vocational technical centers to give support to special education students. However, as described in Exhibits IV-1 and IV-2, these centers offered an interesting contrast in terms of how the various components of the vocational training operated.

Finally, a systematic job placement component of the transition to the world of work was lacking in several LEAs. Special education students often continued in the same jobs that they had during high school. In most cases, these were relatively low-level jobs (i.e., fast food service, etc.).

Summary

The findings regarding availability of vocational education program options during the 1980-81 school year are as follows:

- High schools perceived goals for special education students to include preparation for continuing education, postsecondary training, or employment. The employability goal was strongest for EMR and more severely handicapped students. Goals for SLD students were often unclear.
- The majority of the LEAs addressed some of the gaps in vocational education programs for handicapped students. New collaborative efforts between regular vocational education and special education systems were observed this year.
- Despite progress, rarely did all components of the vocational education system link together smoothly to serve special education students. Unmet needs existed in such areas as vocational assessment, career counseling, curriculum or equipment modification, training of vocational education teachers, and job placement services.

Graduation Requirements and Minimal Competency Testing (MCT)

Since the passage of PL 94-142, secondary special education programming has been through a major reassessment. This reassessment has required some districts and schools to define functional competency needs for different handicapped populations and to match these needs to secondary special education curricula. A parallel development in regular education was occurring with the minimal competency testing (MCT) movement. These efforts at defining minimal competencies and developing testing materials were directed at all students, without regard to individual variability. With the passage of legislation mandating individualized programming for handicapped students, however, homogeneity in graduation expectations and testing requirements had to be reconsidered. Issues that affect the development of MCT policy for the handicapped at both state and local levels include: development of special minimal competency tests, setting of differential standards, modification of testing practices, and creation of alternatives to the awarding of regular high school diplomas.

Exhibit IV-1

VOCATIONAL TECHNICAL CENTER: EXAMPLE 1

At one site, the regional vocational technical center represented an effective resource for special education students within its 16 member districts. Although locally declining enrollment may have encouraged this center to accept more special education students, the director of the center appeared committed to serving these students and had provided various support services to facilitate successful career training experiences for special students. Coordination between the center and the members of the feeder high school districts improved over the past year. For example, a new form was developed for LEA use so that the special needs of each student were clearly identified to the vocational technical center staff.

All new special education students had to go through the center's vocational assessment lab, which used a variety of tests and evaluation systems [e.g., Singer materials, VALPAR, Jewish Employment Vocational System (JEVS)]. This policy, implemented for the first time this past year, was instituted because center personnel had found that "special education kids' needs weren't being met." Assessment results, as well as information from the feeder high school districts, were used in making vocational program placement decisions. A special education resource person met with each vocational teacher at the beginning of the school year to discuss the special needs of handicapped students and to suggest strategies the vocational teachers might use with their students. Vocational instructors were released for 1 day to work on individual vocational plans (IVPs) for each handicapped student. A copy of the completed IVP was then sent to the home LEA for its use.

Exhibit IV-1 (concluded)

The competency-based curriculum broke down each program into specific skills and permitted regular and special education students to work individually at their own pace. The special education resource person was available to work with vocational instructors in making necessary curriculum or equipment modifications (e.g., getting modified equipment for physically handicapped students in welding classes). She and her aide were also available throughout the year to give oral tests, tape reading material, and provide other assistance to special education students.

Three days a week, a state job service counselor was at the center to work with the special education resource person in helping students with job placement. During the 1980-81 school year, all of the seniors were scheduled to go through the job service office to register for full-time and part-time employment openings. In an area with a 9% unemployment rate, 75% to 80% of last year's special and regular education graduates were now employed. In praising the effectiveness of the regional vocational technical center program, the work experience coordinator from one high school commented that a number of special education students who were now seniors (primarily SED) had been eligible for graduation in 1979-80 but had stayed in school for a 5th year so that they could finish their training at the center.

Exhibit IV-2

VOCATIONAL TECHNICAL CENTER: EXAMPLE 2

In another site, the area vocational technical center provided a special program and some support services (in a resource center) available to special education students. Students could receive tutoring and special help in the resource center. In addition, the head of the resource center could work with the vocational instructors to suggest course modifications for individual students; for example, students could be given only oral instructions and tests, or students might be able to cover all the curriculum units but stop at capacity on each unit.

In general, it was difficult for special education students to be accepted into the vocational technical center. Center staff stated that the center "generally gives the kids a chance to come here," that they don't "turn anyone away." However, relatively few special education students attended the center, for various reasons. There was no vocational assessment per se at the feeder high school or the center; it was up to the individual student to decide which vocational option he or she would pursue. Thus, students did not necessarily end up in appropriate options.

Special education students also generally found it "hard to survive" at the vocational technical center. For example, the mainstreaming experiences for the EMR students had not generally worked out. An administrator of the vocational center had the attitude that "most" programs were too hazardous for EMR students. Although some teachers were quite willing to adapt their courses, others were reluctant to make modifications. Part of the reason that it was difficult to modify classes to accommodate students with special needs was that most of the vocational teachers had not been trained to deal with exceptional children. Finally, poor coordination between the feeder high school and the vocational technical center added to the problems of special education students.

Two factors were investigated this past year as possible influences on special education programming at the secondary level: graduation requirements and minimal competency testing criteria. The impact of these factors on secondary special education students in our study sites in 1980-81 is described below.

Influence of High School Graduation Requirements on Special Education Students

Secondary school curricula traditionally include subject-oriented content areas such as science, math, and social studies. To qualify for a diploma, a student generally must complete or accumulate a specified number of graduation credits. Depending on the type of handicap and the special education program, we found that a special education student may or may not be required to pass standard graduation requirements. Differential standards were particularly prevalent in sites that had instituted competency test requirements as part of their graduation standards.

Ten of the 16 LEAs in our study did not have MCT criteria as part of their graduation standards; rather, students were expected only to meet certain unit or course requirements. In these districts special education students might graduate by meeting either the same standards as regular students (low-level courses that are considered "substitutional" and fulfill the required graduation credits), lower standards (e.g., fewer credits), or different standards (e.g., meeting IEP goals). A special education student who met his or her prescribed standard, might receive a regular diploma, a special diploma, a certificate of completion, a "special piece of paper," or some other document. The line between receipt of a regular diploma and receipt of some other symbol of graduation usually was drawn between the mildly and severely handicapped students.

In six LEAs studied, graduation was contingent on course requirements and passage of a minimal competency test. The MCT requirement was mandatory for regular education students but permissive for special education students.

Four of the six sites decided that the IEP team would determine graduation requirements on an individual basis. The feeling was that legal mandates required that decisions regarding special education students be made individually rather than on a group basis. As one special education director replied when asked about the effect of minimal competency tests on special education students:

> You can't require all special education students to take the tests, and you can't excuse all of them. You have to decide on a case-by-case basis and document adaptations, if necessary.

These differential standards could include such things as use of IEP goals, special tests, lower passing scores on the MCT, and test accommodations.

The other two LEAs allowed test modifications for special education students, but students who failed the competency test were not awarded a regular diploma. It was, therefore, possible for special education students in sites with a competency test requirement to receive a regular diploma, but the alternatives for students who did not meet graduation standards seemed to be more restricted than in the sites without MCT criteria. Of the six sites with competency testing requirements, three LEAs had the option of issuing special education diplomas, while the other three might give special education students nothing at all. One of these latter LEAs was considering providing special education students with a skills matrix that would delineate skills a student did or did not have.*

Whether or not competency testing was a graduation requirement, the issuing of different forms of diploma in some cases was not at the discretion of individual LEAs. In two states, state laws specified or restricted the types of diplomas that could be issued. In one state, state

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*The other 2 LEAs were not planning to deny special leducation students some form of a diploma this past year because it was felt that more time was needed to determine graduation standards for these students.

policy required that all students (regular and special education) receive the same diploma. In another state, it was determined that the issuing of certificates of completion was illegal.

Acceptable forms of graduation symbol, coupled with graduation requirements like minimal competency testing or provisions for differential standards, can influence the number of special education students who graduate from high school. A number of LEAs were particularly struggling with the question of differential standards. School personnel in one district who were in the process of trying to set fair differential standards within the constraints set by the state (i.e., no certificates of completion), commented:

> The philosophy of the school is that differential standards are not OK, but a certificate of completion is. Since [a certificate] is not legal now, we're reluctantly modifying our position about differential standards in competencies, credits, modes...[One] can have differential standards, but there has to be a standard.

Whereas some respondents considered competency tests a barrier to graduation for special education students, other respondents saw differential standards to be a means for special education students to continue to graduate and, in some cases, receive a regular diploma for the first time.

Effects of Minimal Competency Testing on Special Education Students

The minimal competency movement began in the early 1970s as a result of growing public concern that the U.S. education system was failing to graduate functionally literate individuals. The public questioned not only the learning expectations for a student to receive a high school diploma, but also the ongoing evaluation process for students attaining basic educational skills from elementary through high school. This concern has resulted in a national reassessment of the educational goals of public education. One of the more controversial paths that this reassessment has taken involves the use of competency tests.

Three of the states in our study are using competency tests as a graduation requirement; two other states are permissive on this requirement; and one state plan to institute MCT as a graduation requirement in the 1982-83 school year. As discussed above, we found that competency tests can affect graduation standards; however, of greater concern were the effects such tests might have on special education student programming.

There are arguments that trying to meet or adapt traditional secondary school graduation requirements for special education students may not facilitate individual career development for many handicapped children, because the traditional secondary school curricula and the skills/competencies needed by many handicapped students remain disparate. Other arguments have arisen over the limitation of postsecondary opportunities for special education students if they are denied diplomas because of competency tests, the validity of competency tests, the legality of dual graduation criteria for special and regular education students, and other such issues. Many of these issues have arisen at the study sites. The perceived, as well as actual, impacts of MCT, as viewed by respondents, are described below.

Impact of MCT on Curricula

Points of view differed on the effect MCT has had or will have on the curricula for special education students. Some respondents felt that curricula had become less flexible (as by teaching only MCT objectives or basic skills, curricula having no relation to functional skills). For example, a special education director who was worried that the district's minimal competency requirements might limit skills training asked: "Do we want a kid to get a job or get a diploma? We can't do both." Others saw curriculum improvements as a result of minimal competency standards. Teachers in one district felt that the district's minimal competency standards had helped to target skills development (e.g., the tests are criterion-referenced, which aids in determining the level of remediation needed) and that the practical skill orientation of the test had enriched both the special and regular education curricula. In another LEA using

competency testing, the district was developing an adaptive criterion-referenced curriculum for EMR and lower functioning SLD students to assure some sort of standardization in course content across the district. In addition, it was hoped that the adaptive curriculum would provide an alternative route so that special education students, who now received only "special diplomas," might receive regular diplomas if they met certain criteria.

Other concerns involved the problems of teachers teaching to the test and possibly ignoring individual needs. We found that less individualization might not be a problem, however, if the skills outlined in the competency test were compatible with special education program skills and were tied to IEP goals. Thus, it appeared that the point of view of respondents was based on whether or not they perceived the MCT goals in their district to be appropriate: if the goals established were appropriate, then competency tests could be beneficial; if inappropriate, they could have adverse effects on special education students.

Impact of MCT on Length of Stay in School

Another concern involved the possibility that special education students would drop out at an increased rate if they saw no opportunity for passing the MCT and, therefore, of earning a diploma. In a small rural LEA, respondents told us that one of the big incentives for special education students to stay in school was the opportunity to earn a high school diploma; but the test that this state plans to use is very academically oriented, and even the mildly impaired may have difficulty passing. This concern may be alleviated if the LEA is able to use differential standards or if a system of remediation is built into the MCT program. In another site, which has an early identification and remediation system as a component of the state's minimal comptency standards, MCT has become a screening

device for detecting learning problems in time to provide remediation, so that few students would fail to receive a diploma in 1981.*

In contrast to concerns over increased dropouts, some respondents felt that competency tests would require LEAs to provide services to students for additional years until they could finally graduate with a diploma. In two LEAs with MCT requirements, district personnel saw no trend in this direction because, as they commented, opportunities had always been available for students to get a diploma through adult education. On the other hand, the legislatures in both states where these LEAs are located required their districts to provide a "13th year" of instruction to students who fail the MCT in their senior year.

Impact of MCT on Special Education Enrollment

Several respondents were concerned that regular education students who might fail the competency tests would try to get into special education, in order to benefit from the differential standards allowed by some districts (primarily for borderline SLD students). The fear that special education would become a "dumping ground" because of minimal competency testing was addressed by one LEA, which established MCT criteria for special education students comparable to those for regular education students. These differential standards included passing a "special" MCT for handicapped students having difficulty with the regular proficiency test. This special test included the same skills as the regular test, but used simpler language and was more "practical."

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*The provision of remediation classes can put a financial burden on LEAs without SEA support. Two states in the longitudinal study have or are considering providing additional funds for remedial classes. These funds cover expenses for regular education students but not added expenses for remediation efforts for special education students.

Impact of MCT on Postsecondary Opportunities

A major concern of respondents revolved around the impact that competency testing will have on postsecondary employment and educational opportunities for special education students, particularly if they are denied regular diplomas. There were mixed reactions regarding the question of employment opportunities if handicapped students are given special diplomas, certificates of completion, or no diplomas, on the basis of proficiency requirements. One special education director in a small community expressed concern about future state MCT standards:

> If we can't give degrees to these [special education] kids because they can't do fractions, then these companies, whose personnel policies are made in New York, can't hire people without diplomas--and EMR kids are some of their best workers.

An assistant principal in another LEA felt that the number of students returning to school to earn the general education diploma (GED) was an indication that employers value a diploma.

On the other hand, other respondents saw no direct relationship between the attainment of a diploma and future employability, for a variety of reasons: (1) many special education students (primarily EMR) continued with the jobs that they obtained in high school, (2) many employers didn't ask whether students had a diploma (employers asked about the highest grade completed), and (3) students who received a special education diploma could be considered "graduated" if the question was asked by employers (although certificates of completion might be another story). In addition, with increasing public awareness of competency testing, personnel requirements on job applications may change to reflect the different meanings of "graduate."

Some respondents felt that postsecondary educational opportunities may be limited for special education students who do not receive a regular diploma because of MCT requirements. Others saw few problems in this area, for several reasons:

- In two LEAs, changes in graduation requirements as a result of MCT have created the opportunity for special education students to earn a regular diploma for the first time.
- Participation in adult education does not require a diploma and, as pointed out earlier, provides an avenue to earn the equivalent of a diploma if needed for additional vocational training or college entrance.
- For admission to some college programs, there are probably greater obstacles than lack of a diploma for special education students (i.e., passage of entrance exams).

Legal Impacts of MCT

In sites where minimal competency testing is a graduation requirement, LEA personnel were concerned about the social and legal consequences of denying students diplomas. As one special education director stated: "We are caught between the student's desire for a diploma and the public's desire for the diploma to mean something." The points of contention seemed to be the degree to which graduation standards should be different for special education students, as well as the amount of time given to students to prepare for the test.

A special education coordinator in one large LEA expressed some concern that if students failed the state competency test, there might be some due process ramifications: "Lawsuits may result because there may not be enough remediation given or preparation for the test." This concern was justifiable; two states in our study already have been involved in hearings on this subject. In Illinois, an SEA administrative panel found that one of its LEAs had violated the rights of 12 handicapped students by "unreasonably" requiring them to pass a competency test in order to receive a high school diploma. The panel based its decision on the fact that there had not been "adequate and timely notice that the competency test would be a prerequisite for the receipt of a diploma."* In Florida, as a result of the

*Education Daily, May 15, 1981.

Debra P. v. Turlington court case, the SEA was required to give a lead time of 4 to 6 years for students to pass the functional literacy test as part of the state's graduation requirement. Although this second case pertained to minority students who were in segregated schools and had not been taught requisite skills contained in the literacy test, it seems quite likely that the same type of argument can be applied to handicapped students (e.g., where special tests or new special education curricula have recently been created, or where opportunities to participate in regular education have only recently been available).

The problem of differential standards also raises the problem of dual standards, i.e., when regular education students are denied a diploma but special education students are not because of laws supporting the rights of the handicapped that require individual standards. Some SEAs have interpreted Section 504 and PL 94-142 requirements as legally binding the districts and states to provide handicapped students and regular education students with the same benefits, which include the right to a diploma. For example, in one state in our study, draft regulations on diplomas and grading state:

> As long as handicapped students have successfully completed all requirements for graduation as outlined by their IEP teams or regular classes (following the State Board of Education guidelines for high school graduation), they cannot be denied graduation or given inferior diplomas.

On the other hand, the court case and state panel decision cited above did not deny the right of LEAs or SEAs to impose MCT procedures as part of graduation requirements. The general interpretation of federal mandates on behalf of the handicapped children in these two cases appears to be that handicapped students are entitled to equal opportunities to attain benefits, but they do not have a constitutional or statutory right to receive academic credit or a high school diploma. However, these interpretations are currently being questioned through other court action.

Other legal concerns expressed by respondents over use of competency tests included those of test validity and inconsistencies of graduation requirements among school districts within a state. This problem was particularly acute in states that allow local discretion in setting graduation standards (i.e., where competency testing is a permissive requirement) and in selecting proficiency standards (e.g., developing local tests, emphasizing different skills, setting success criteria).

Unresolved MCT Issues

Many issues remain unresolved in the development and implementation of MCT programs. For both regular and special education students, MCT programs require a reconsideration of the significance of the high school diploma and the validity of tests in setting educational competency standards defined as minimal. If proficiency tests are to be used for graduation requirements, such tests present particular concerns for handicapped student populations. Some of the major policy issues surrounding the implementation of MCT programs for handicapped students include the following*:

- Inclusion or exclusion of specific handicapped populations in minimal competency testing.
- Development and accessibility of appropriate tests for the handicapped.
- Skills to be assessed by the competency test (e.g., academic, functional "life" skills).
- Remediation or supplementary instruction available and financial support provided for this additional instruction.
- Alternative graduation (differential) standards and awarding of diplomas or certificates of completion.

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*For additional information on policy issues raised by minimal competency programs, see SRI's technical assistance guide, "Minimal Competency Testing and Special Education Students."

- Determining locus of control for MCT policy (i.e., setting MCT criteria and test development at the state or local level).

Summary

The findings during 1980-81 regarding the effect of graduation requirements and minimal competency testing on special education students are summarized as follows:

- The handicapped students who were hardest hit by MCT requirements were the mildly handicapped, who generally were expected to meet the same graduation requirements as regular students (although few were failing to graduate in 1981). This situation was particularly characteristic of districts where these special education students had always received regular diplomas in the past.
- A major policy consequence of including the handicapped in competency testing has been the establishment of differential graduation criteria (standards) because students with learning problems may not be able to meet the required proficiency standards.
- In some cases, IEPs were being used at the local level to determine graduation readiness and to set differential standards. While still providing special education students the right to take regular competency tests, the use of IEP criteria to set differential standards for graduation has become a workable policy alternative. Policy, in general, remains flexible and may change as competency testing becomes fully institutionalized.
- The use of differential standards for graduation of handicapped students creates the problem of dual standards. LEAs are concerned about the possible backlash from parents of regular education students and the legal ramifications of applying proficiency standards to handicapped students (e.g., denial of diploma, test validity, equal opportunity issues).

Postsecondary Opportunities for Special Education Students

This past year, for the first time in this study, we inquired about goals and programs for the 18- to 21-year-old handicapped population, and explored the actual postsecondary options for special education students

after they graduate or leave school.* We also tried to assess the transition process to the "real world" to see whether it and the options available in the community had any impact on where special education students go or what they do after they leave high school. We found that school systems do not generally include postgraduation opportunities in their domain of concern, nor does any other agency think in terms of age-defined groups. Rather, these students fall into one or more of four options after high school: continuing education (e.g., college, adult education), employment or further vocational training, clients of caretaking or other human service agencies (e.g., welfare, group homes), or "other" (e.g., military, at home, corrections system, "on the street"). Again, the degree of self-sufficiency or independent living that they attain depends not only on their capabilities and preparation, but also on the social institutions and other local resources for handicapped people.

In the majority of the study sites, respondents indicated that after high school most mildly handicapped students are "assimilated into the mainstream to either sink or swim." The widest range of postsecondary opportunities exists for the higher functioning SLD students who were in resource programs while in high school. We were told that these students tend to enter the job market directly, join the military services, pursue postsecondary training, or continue their educations at community colleges or private colleges.

Our findings are discussed in greater detail below. It should be pointed out, however, that LEAs typically generate little hard data on student follow-up; therefore, our findings are based mainly on the impressions of LEA personnel.

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*PL 94-142 requires LEAs to provide services to special education students through their 21st year unless contrary to state law. As described previously, most handicapped students graduate or leave high school around 18 years of age. The severely handicapped, however, are more likely to stay in school until a later age.

Continuing Education

In at least nine sites, support services for handicapped students, particularly SLD students, were available at local community colleges.* However, because of the lack of formal linkages between the school districts and the community colleges, few high school students were aware of what was available at the community college level. In some cases, where colleges had already developed such support services over the last few years, programs were full; thus, community college administrators were not eager to advertise their programs for fear that new demands would exceed their service-delivery capabilities. However, in one site, where the community college was in the process of building a new support program, the college specialist for the disabled hired an SLD specialist to provide direct services and to inform LEAs about the availability of services.

Although most LEAs did not actively help SLD students transition to college, we did see an example of how a district can provide assistance. In one state, where community colleges were just beginning to address special needs of handicapped students, we found a local high school district committed to helping its SLD students find appropriate 2- or 4-year college programs. In this LEA, located in an affluent community, many SLD students enter college because of high parent expectations. The high school guidance department had been looking at special services offered by colleges for about 4 years. This effort was designed not only to identify colleges with special education support programs, but also to evaluate the quality of these programs. The guidance staff has reviewed written materials and has talked with various college staff members: "We phone a lot of people and we ask a lot of questions." Parents have also been helpful by interviewing staff at colleges at night. In addition, the LEA has a resource library on

*Five of these sites are in two states with progressive community college systems.

special education for college students, because "there's such pressure from parents to attend college." An SLD resource teacher indicated that, although some of her former students went to colleges with support programs, some were "taking light loads and doing OK" at colleges without such programs.

Employment and Postsecondary Training Opportunities

The number of handicapped students who are able to find competitive employment on leaving high school or after completing additional vocational training appears to be related to a number of factors. One of the most significant of these is the quality of secondary vocational training received by special education students, which is generally related to the goal set for handicapped students in high school. That is, if the secondary special education curriculum has a strong emphasis on vocational training and getting students jobs, then handicapped students are more likely to find or seek employment (including additional training) on leaving school.* For example, in an LEA that has a strong vocational emphasis, respondents spoke of four mildly handicapped special education graduates who had obtained various jobs: fireman, maintenance worker, waiter, and industrial worker.

On the other hand, setting employment as a goal for special education students is by no means a guarantee of employment, because of the variety of other factors that influence successful employment. For example, special education students provided with vocational training may not get jobs because none are available in the community (e.g., because of a high unemployment rate or saturation of the job market), or because students are not trained for the jobs that are available. In addition, jobs for which

*Six sites set clear employability goals for all special education students; the majority of sites see employability as a goal for lower functioning handicapped students, but not necessarily for SLD students.

special education students are trained often fall into the "low-level," semiskilled category and therefore provide only marginal income.* In the past, this situation reflects the quality of the vocational education training provided to handicapped students.

For more severely handicapped individuals who are eligible for various welfare benefits, there is often little incentive to work because the income that they could earn on a job is generally less than what they can collect from their benefits by not working. As the education director at a service agency in one large urban community commented: "It does not pay for them to be employed. They lose SSI, Medicare/Medicaid unless they can get a job that pays enough to pick up their medical costs. They really lose by working." A respondent in another site gave an example of an EMR student with a visual handicap who had worked while in school but was now at home because SSI payments provided a better income.

Although vocational training in high school may provide special education students with an entry-level skill, some students need follow-up support with "work adjustment" training (e.g., necessity of being on time, how to interact with fellow workers) to keep their jobs. Compounding this problem, many employers do not know what to expect and are not prepared to deal with handicapped employees. A vocational education district serving one LEA in our study was trying to overcome these problems through a pilot work-study program for SLD seniors at a vocational school. Students spent two half-days a week in a classroom, learning "survival skills." For example, they learned about job applications, labor unions, and human

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*Levitan & Taggart (1976) reported that only 40% of the adult disabled population is employed, compared with 74% of the nondisabled. According to 1976 U.S. Bureau of the Census statistics; of the handicapped individuals who are employed, 85% earned less than $7,000 per year and 52% earned less than $2,000 per year. Handicapped individuals made up 1.7% of postsecondary enrollments in vocational education programs in fiscal year 1978.

relations. Students also spent three half-days a week in on-the-job training stations. As part of this program, the instructors worked with employers even before students were sent out for this on-the-job training. For example, the instructors informed the employers of each student's disability, and provided them with suggestions for dealing with each student (e.g., to give only oral instructions, give only visual instructions, or give only one instruction at a time). Because it was felt that "the problem is keeping the job, not getting it," follow-up was also provided once students were placed in their training stations. A large part of the pilot program instructors' time was devoted to this follow-up effort. For example, employers were seen or called at least every other week, and problems were discussed. The employers were encouraged to call the instructors if any problems emerged; in fact, a pilot program instructor stated that he often was told that a problem existed before the student was aware of it. The instructors also asked the employers for suggestions concerning areas to cover or materials to use in the classroom part of the pilot program. Finally, the instructors could provide follow-up services for students after graduation, for example, by working futher with employers.

In some cases, handicapped students have difficulty obtaining jobs because of transportation problems. For example, many EMR graduates face problems if they have not learned to drive because other means of transportation are not always available. However, it is sometimes difficult for these students to get their driver's licenses, especially if the test involves reading.

Finally, another factor affecting the employment opportunities of handicapped students are the eligibility requirements and "success" criteria used by human service agencies who provide the disabled with support services in finding employment. In one site, for example, the Department of Vocational Rehabilitation (DVR) was providing only limited services to SLD students despite new federal guidelines to serve this population because (1) DVR counselors did not know how to ascertain whether this disability was a "substantial" obstacle to employment and, therefore, were still "scared" of the category; and (2) state policy was to serve the severely disabled

population first, and DVR was required to provide services only to the extent funds were available. In another site, DVR counselors were judged by the number of successful job placements they made; they generally did not take severely handicapped clients and had "little dealings" with TMR people. In a third site, a respondent remarked that, although high placement quotas provided a disincentive to take on clients who were hard to place, low quotas for the severely handicapped provided a disincentive to seek competitive employment outside the traditional sheltered workshop setting.

Given the numerous factors that influence employment opportunities for handicapped individuals, it appeared that the mildly handicapped (high-functioning SLD and mild SED) and the motor and sensory handicapped populations generally had the best chance of getting above a marginal existence, primarily because of their own abilities. The rest of the special education population tend to end up with low-level jobs (i.e., "in jobs that don't require much reading") once they leave school.

Human Service Agency Services

Agencies serving the adult handicapped population vary from community to community; but, in general, agency services for the severely handicapped (e.g., TMR, SMR) are more extensive and better coordinated (i.e., the transition from school to agency services is much smoother than agency services for the mildly handicapped). The mildly handicapped usually must seek out services for themselves, because formal linkages with agencies tend to be fairly weak for this special education population. This situation varies, however, with the attitude or circumstances of the community.

Nevertheless, smooth transitions do not always occur. In one city, for example, services to the TMR and SMR adult populations were very limited because deinstitutionalized adults coming out of the nearby mental health facility received first priority in getting into sheltered workshops and group living situations. Students who attended the public school district

programs were being put on 2-year waiting lists, and most were "at home watching TV." A respondent from the mental health agency commented:

> Profound cases get services; kids not climbing the walls are at home on waiting lists. They're disappointed but not making waves. It is unlikely the situation will change soon or even improve--parents of the handicapped are not as powerful at getting adult services.

Although the severely handicapped population generally receives most of the social services available, some respondents questioned the quality of these services. They felt that little effort was being made in obtaining alternative placements for clients (e.g., moving them out of sheltered workshop settings). Part of the problem was a limited continuum of services coupled with varying attitudes among agency personnel, clients, and parents, as indicated by the following responses:

- A special education supervisor felt that future opportunities for EMR students were limited because of preconceived notions of their limitations: "Perhaps he will not be a landscape architect, but he could do more than mow lawns."

- The director of a sheltered workshop was concerned that some of the EMR students at his facility were inappropriately placed: "Once EMR students [get here] they tend to get locked in--it becomes too comfortable for them sometimes."

- One special education teacher indicated that moderately retarded students in the district often "fall through the cracks," because they do not have the necessary skills for competitive employment. Many of the sheltered workshops that used to accommodate these students are no longer appropriate because of an increased emphasis on work speed and production. Retarded people are being "pushed out" of job slots now filled by more skilled workers such as mentally ill individuals and people on probation. Also, many of these students' parents are overprotective and do not have high enough expectations for their children; or by the time the student is 18, parents are tired of helping and can no longer "face it."

A major concern of human service agency personnel is actual or impending cutbacks in funding at the federal, state, and local levels. The tight money situation will cause reductions in services (already considered limited in some cases), which generally translates into targeting services to the severely disabled as the major priority. Exhibit IV-3 presents the

Exhibit IV-3

EXAMPLE OF HOW FUNDING REDUCTION AFFECTS SERVICE DELIVERY

The Projects with Industry (PWI) program is being cut back. This program, which is federally funded, provides job placement and job development services to clients of the Department of Vocational Rehabilitation (DVR). This cutback will reduce the DVR placement rate, because DVR counselors do not have the expertise and contacts that PWI counselors have. DVR, in turn, is also cutting back on services and setting priorities for services to its clientele, with emphasis on the severely handicapped, because of funding cuts at the state level. In addition, Basic Education Opportunity Grants (BEOG), which are being used by DVR to help clients receive college-level training, are being cut at the federal level; this cutback will limit opportunities further. Finally, if tax incentives,* which have been used to help some clients get jobs, are dropped or reduced, placement rates will continue to decrease.

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*In some sites, the federally funded Targeted Jobs Tax Credit (TJTC) program provided an incentive to employers to hire SSI recipients and handicapped individuals referred from vocational rehabilitation agencies. The business credit is equal to 50% of a handicapped person's first-year wages up to $6,000 and 25% of second-year wages up to $6,000.

cumulative impact of funding reductions on the level of service delivery in one city, as described by the DVR representative.

Because low functioning SLD and higher functioning EMR students often fail to meet agency eligibility requirements for these social services, and because few suitable programs exist for them, they may be least well matched with needed social services.

Summary

We found that postsecondary opportunities for special education students are influenced by local community factors (i.e., continuing education institutions, employment opportunities, and range of agency services), which may vary considerably from place to place. Our specific findings for the 1980-91 school year are as follows:

- High functioning SLD and mild SED individuals, as well as the motor and sensory handicapped, had the widest range of postsecondary opportunities: continuing education, employment, vocational training, military services, and so forth.
- Employment opportunities for handicapped adults appeared to be a function of a variety of factors, including nature of the community, state of the local economy, quality of vocational training at the secondary level, and incentives for employment.
- Human service agencies generally provided services to low functioning EMR, TMR, and SMR adults. Funding cutbacks, however, may lead to a reduction of such services.
- Because low functioning SLD and higher functioning EMR students often fail to meet agency eligibility requirements for these services, and because few suitable programs exist for them, they may be least well matched with needed social services.

V SUMMARY AND CONCLUSIONS

The findings presented in this report are based on an analysis of data across 16 case studies of local education agencies. These LEAs were included in the third year, 1980-81, of SRI's longitudinal study of local progress in implementing PL 94-142, the Education for All Handicapped Children Act. In 1979-80, after 2 years of field data collection, we concluded that LEAs continued to make some progress in implementing the provisions of the law. New procedures were being incorporated into daily practice, which allowed professionals to begin to assess whether the procedures were accomplishing the purposes intended. Moreover, as procedures became routine, special education personnel had more time and energy for the delivery of services to handicapped children. However, we concluded that progress toward full implementation of the law--in the sense of its intent to have an individualized, child-driven system--continued to be constrained by three factors in the existing local special education service delivery system: inadequacy of available resources, limited knowledge and skills on the part of education personnel, and vague definitions of the borders of LEA fiscal and legal responsibility.

In view of these second-year findings, the third year of data collection focused on (1) how LEAs dealt with these factors in attempting to meet the full-service goal for their handicapped population and (2) whether within these 16 local service delivery systems, school personnel were better able than before to meet the intent of PL 94-142. In particular, we pursued in depth the "remaining challenges" associated with secondary-level programming for special education students. We looked at academic and vocational education opportunities provided by LEAs to help students prepare for the transition to the world of work, continuing education, postsecondary training, or services from other agencies. In this section, we summarize

the third-year findings, comparing them with the second year's, and we then draw general conclusions about the status of implementation in 1980-81.

Overview of Progress in the 1980-81 School Year

Implementation at the LEA Level

In 1979-80, we found that in response to external pressures, emphasis in a majority of LEAs in the SRI study was placed on decreasing backlogs and waiting lists for services. Strategies used to reduce backlogs included hiring more evaluation personnel and expanding services. Although the reduction of backlogs for initial evaluation and placement remained a priority this past year, backlogs existed in the majority of the sites, primarily at the evaluation stage. Adding evaluators was still the most common strategy used to tackle the backlog problem; fewer districts expanded services to accommodate more students. However, the continuing existence of backlogs is not surprising, Because of anticipated limits on or decreases in LEA resources, special education administrators, in general, attempted to maintain the status quo of their special education service delivery systems through minimal expansion.

During 1979-80, all LEAs in the sample used their available resources to expand services in one way or another. In the 1980-81 school year, with few exceptions, program expansion was more limited in scope. Simultaneous expansion at both the preschool and secondary levels occurred rarely. A few LEAs expanded or maintained their preschool programs (often with preschool incentive grants available under PL 94-142), but most districts focused their efforts on addressing program gaps at the secondary level, primarily in vocational education, SLD, and SED programs. Few changes were observed in the nature or quality of services to the following handicapped populations: 18- to 21-year-olds, severely handicapped, and children in private schools. Although related services increased slightly in half of the study sites, the changes can be characterized as "more of the same."

Overall, we did not observe a contraction of the delivery of special education and related services (SEARS) from the levels to which they have grown over the past 3 years. For the most part, however, LEA special education administrators were attempting to limit program expansion or to maintain the status quo within their local service delivery systems, in anticipation of federal and state cutbacks in funds for education.

This year, we found pervasive concern at the LEA level regarding the fate of PL 94-142 (rescission of the law was being discussed at the time of our site visits), as well as the possible weakening of federal and state mandates for a free, appropriate public education (FAPE) for handicapped children. The mood of fiscal conservatism under the Reagan administration and related state developments were perceived as major constraints to district planning for future expansion in special education. Although LEA administrators continued to fill gaps in their local service delivery systems, they tended to approach change much more cautiously. In general, people worried more about all resources, not just PL 94-142, which remains an important but small percentage of their overall special education budgets.

During 1979-80, dimensions of the borders of LEAs' legal and fiscal responsibility to provide SEARS to all eligible children within their jurisdictions became clearer, as school districts experienced more questions surrounding related services. In some cases, the borders were clarified by court cases, OSE monitoring, or a change in state policy. Despite some concern last year over the 12-month schooling issue raised by Armstrong v. Kline, few LEAs saw this as a demand on them this year.

However, one issue of direct concern to most LEAs in the study--the provision of mental health services (psychotherapy, psychological and psychiatric counseling)--remained an issue in 1980-81, because no clarification has come from OSE. The majority of study sites continued to draw the line of their responsibility at their traditional medical/ educational border (i.e., that psychotherapy is a medical, not an educational service).

Education agency responsibility for related services also remained a problematic issue in the area of interagency coordination because of (1) the general supervision clause of PL 94-142, (2) the law's requirement that related services be provided to handicapped children at no cost to their parents, and (3) the political and financial realities of how state human service delivery systems function on a day-to-day basis. Although some states in the SRI study made progress in implementing interagency agreements, there continued to be wide variation in the extent to which integration of services to the handicapped had been accomplished by the 1980-81 school year. In addition to the continuing need to review and revise conflicting laws and regulations pertaining to cooperative service arrangements, SEAs and LEAs must commit resources to bring about interagency cooperation. Adequate incentives must exist for education and other human service agencies to cooperate; currently, incentives vary depending on local and state-level circumstances.

Court cases continued to influence various aspects of local special education service delivery systems, although due process hearing activity continued to decline this past year. Unlike court cases, due process hearing decisions per se do not generally produce programmatic or systematic changes in LEA policy. For the most part, informal resolution of parent complaints through various complaint procedures has increased over the past 3 years.

Practices at the School Level

During 1979-80, we observed that the procedural requirements of PL 94-142 had been refined and had been incorporated as routine practices. Most administrative procedures (the IEP process in particular) were a generally accepted part of the job, and the majority of the LEAs viewed them as less difficult to perform than in the first year (1978-79).

In 1980-81, we saw little change in school-level practices. Techniques designed to increase the appropriateness of referrals to special education

(i.e., intervention prior to formal referral to special education) continued to be used. In general, we did not find a greater emphasis on prereferral screening and intervention, but a few LEAs showed systematic increases in this area, in response to changes in state regulations and, in one case, as part of district planning. As reported last year, professional staffs in sites using prereferral intervention techniques believe that such techniques increase the appropriateness of formal referrals to special education.

Although the pattern of increasing multidisciplinary evaluation and individualized assessment practices continued this past year, the evaluation picture shifted slightly at both the elementary and secondary levels. That is, the changes demanded by external factors (e.g., state regulations and monitoring, OSE monitoring) seemed to be directed toward refinement, rather than restructuring, of the system. For the most part, the changes demanded by previous court cases (e.g., Mattie T. v. Holladay and Larry P. v. Riles) have already been made. Although we found this year that most LEAs provided information to parents concerning their right to an independent educational evaluation at public expense if they disagree with an LEA evaluation, parents rarely used this option. However, LEA evaluation teams did tend to give consideration to the few parent-initiated independent education evaluations they received. Reevaluations every 3 years continued to be of low priority, except in districts where external factors (court cases, monitoring) created pressure to attend to them.

In determining children's services on the basis of individual needs, school personnel remained constrained by what services were currently available. Given limited program expansion and change in the continuum of program options, professional staffs could rarely consider services not already available through their individual districts when making decisions about children's services. Although parent involvement in school-level decisionmaking is now considered a routine part of the evaluation and placement process, parents' input remained primarily nonsubstantive in nature.

We did observe major changes in IEP practices in the study sites, related both to the time when short-term objectives are written (i.e., before rather than after placement) and to the nature of the objectives. The pattern in the majority of the LEAs was to write broader short-term objectives. In effect, this practice made IEPs less like instructional plans, so that they reflected the intent of OSE's recent interpretation of the IEP requirement.

In general, there was little expansion in the continuum of options available to handicapped students, and a wider continuum of placement options continued to exist for mildly handicapped students (primarily SLD and EMR) than for the more severely handicapped (e.g., TMR, SMR). Although we saw no major change in the amount of mainstreaming of special education students this year, we did find that new strategies to facilitate mainstreaming continued to be developed. We found generally that regular teachers continued to accept their expanded role vis-a-vis special education students, thus making mainstreaming easier to accomplish.

Given limited program expansion in 1980-81, there were few additions of instructional personnel. Even though LEAs sought to maintain the status quo, the existing work force was required to take on additional responsibilities or workloads to try to maintain appropriate programming for handicapped children. Where boundary crossers had existed previously, they continued in their primary function of bridging the organizational barriers between regular and special education personnel. This year, we found an increase in the number of boundary-crossing personnel, primarily because of increased coordination between the special education and vocational education systems at the secondary level.

Efforts to increase the knowledge and skills of regular and special education personnel through inservice training changed little in 1980-81. As has been the case in past years, both regular and special education personnel need more substantive training regarding working with handicapped students, as do regular education teachers who work with slow learners in

the regular classroom environment. Overall, inservice training remained a low priority at both the LEA and SEA levels.

Secondary and Postsecondary Opportunities for Handicapped Individuals

In 1979-80, we found that although a wide range of high school program options existed across the LEAs, rarely did a comprehensive range of options exist within a given LEA. A handicapped student's program options were determined largely by what was available within a district, and varied substantially across sites. Although our findings this year are consistent with those of last year, we obtained more in-depth knowledge of the goals and opportunities for secondary students. In general, LEAs in this study believe that their high school programs should prepare special education students for continuing education, postsecondary training, or employment. The employability goal is strongest for EMR and more severely handicapped students. Overall, more program options exist for the upper range of handicapped students, primarily SLD, higher functioning EMR, and SED students with socially appropriate behavior.

Despite budgetary constraints, the majority of LEAs targeted more resources to gaps at the secondary level than to any other level of the local special education service delivery system. In particular, efforts were made to improve SLD, SED, and vocational education programs and services. Factors influencing this pattern included: (1) more students who had been identified as handicapped at the elementary level were reaching the secondary schools, and (2) declining enrollment in the regular education population meant that vocational program staff and others had time to devote to the special education population.

The majority of LEAs addressed vocational education programmatic gaps in 1980-81. While some districts expanded programs, others focused their efforts on creating new roles, or modifying roles or procedures, to better coordinate vocational education services for special education students. We observed new, collaborative efforts between the vocational education and

special education systems; such cooperation is a significant factor in providing handicapped students with access to greater vocational and technical training opportunities. Despite LEA efforts to improve the components of their vocational education service delivery systems, however, all system components rarely linked together smoothly. The transition of handicapped students from school to work is often difficult. Unmet needs existed in such areas as vocational assessment, career counseling, curriculum and equipment modification, and job placement services.

When we looked at minimal competency testing (MCT) this year, we found that many issues remained unresolved in the development and implementation of MCT programs. Where such tests were used for graduation requirements, they presented particular concerns for the handicapped student population. MCT programs require educators to reconsider the significance of the high school diploma and the validity of tests in setting educational competency standards defined as minimal. Major MCT policy issues affecting special education students include: exclusion or inclusion of specific handicapped populations in MCT programs, development and accessibility of appropriate tests, and differential standards for graduation.

This year, for the first time in this study, we inquired about goals and programs for the 18- to 21-year-old handicapped population and explored the postsecondary options for these special education students when they graduated or left school. We found that school systems did not generally include postgraduation opportunities in their domain of concern, nor did any other agency think in terms of age-defined groups. Rather, these students fell into one or more of four options after high school: continuing education (e.g., college, adult education); employment or further vocational training; clients of caretaking or other human service agencies (e.g., welfare, group homes); or "other" (e.g., military service, at home, corrections system, "on the street"). Again, the degree of self-sufficiency or independent living that they attained depended not only on their capabilities and preparation, but also on the social institutions and other local resources for handicapped people.

Postsecondary opportunities for special education students varied considerably across districts. As is the case while in school, the mildly handicapped (high functioning SLD and mild SED) and the motor and sensory handicapped had the most opportunities open to them in the postsecondary world. For more severely handicapped (e.g., low functioning EMR, TMR, SMR), there were generally some caretaking services available, but these service agencies also felt threatened by funding cutbacks. Because low functioning SLD and higher functioning EMR students often fail to meet eligibility criteria for these services, and because few suitable programs exist for them, they may be least well matched with needed social services.

Conclusions and Anticipated Changes

During the third year of this study, we collected data in 16 of the original 22 sites. On the basis of the data, we conclude that LEAs continue to progress in implementing PL 94-142. In contrast to last year, the law's requirements per se seemed to have less influence on LEA special education administrative decisionmaking than did other external factors (e.g., court cases, policy changes, SEA regulations) and internal factors intrinsic to individual service delivery systems. For example, even when LEAs took corrective action in response to monitoring (e.g., making IEP objectives less like instructional plans), they made additional adaptations consistent with their local systems.

Districts continue to move toward the full-service goal of PL 94-142 by addressing special education program gaps, particularly at the secondary level. However, they remain constrained by the three problem areas of inadequate resources, limited knowledge and skills of education personnel, and vague definitions of the borders of legal and fiscal responsibility. In 1979-80, we noted that LEAs were becoming more aware of the dimensions of the constraints under which they must operate and the extent to which they have control over them. As the dimensions became clearer, LEAs were better able to focus their limited resources on solutions to local SEARS problems. In 1980-81, these dimensions became less clear because of anti-

cipated federal and state cutbacks in support to special education. As a result, LEA administrators were concerned about the future of service delivery to handicapped children.

Although it should be noted that we visited the study sites at a time of great uncertainty about federal funding levels and thus heard fears of the worst possible scenarios, it seems clear that LEA administrators will be faced with future cutbacks and should plan conservatively. PL 94-142 will remain a categorical federal aid program for at least 1 to 3 years, after recently being excluded from the Reagan administration's block grant legislation for federal education programs; however, the entire federal role in education is being fundamentally reassessed. PL 94-142 funds will remain targeted to handicapped children in the short term, thus avoiding competition for dollars among the targeted population groups (i.e., Title I disadvantaged, the handicapped), but the federal funding role is expected to diminish within the next few years.

Reflecting on the future of federal funding, OSE's Assistant Secretary Designate commented recently that lower budgets are going to be a fact of life for schools over the next few years:

> We need to realize that we aren't going to have as much money. And so people are going to have to really look at providing services and how they can do it most most effectively and be a little creative.*

The Assistant Secretary Designate also indicated that some court decisions have interpreted PL 94-142 to require LEAs to provide services (e.g., catheterization) beyond their borders of educational responsibility. However, the issue remains that unless LEAs draw their own borders of legal and fiscal responsibility for SEARS, it is unclear at which level--federal,

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* Education Daily, July 1, 1981.

state, or local--such clarification will occur. We have suggested previously that local staff need OSE's assistance in clarifying their borders of responsibility. When the impending changes in PL 94-142 regulations become known, it should be apparent at which level such decisions most appropriately should be made. Clarification in this area should also contribute to the resolution of problems that still remain in the area of interagency coordination of related services at the state level.

Given impending changes in the locus of educational decisionmaking, we conclude that OSE should consider focusing its technical assistance efforts on assistance designed to enhance local capacity to adapt to the realities of fiscal conservatism. Some of the creative strategies we observed this year (described in Sections II, III, and IV), might be helpful to many LEA administrators struggling with major planning decisions.

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Appendix A

CONCEPTUAL FRAMEWORK

Appendix A is taken from pages 9-21 of Local Implementation of PL 94-142: First Year Report of a Longitudinal Study, Marian S. Stearns, David Greene, and Jane L. David, 1980.

Appendix A

CONCEPTUAL FRAMEWORK

Overview

Public Law 94-142 is a federal mandate to change the way state and local school systems operate in providing services to handicapped children. The primary purpose of our study is to inform BEH and Congress about whether special education at the local level is changing in the way the law intended and, to the extent possible, to explain why or why not. We view local implementation of PL 94-142 as a process of mutual adaptation between the requirements of the law and the realities of local school systems (cf. Berman and McLaughlin, 1978). The requirements of the law dictate changes that local school systems must undergo, but the degree of these changes and the forms they may take are constrained by the organizational and financial structure of the schools and the political and social idiosyncracies of each local community.

The basic orientation and focus of the study are provided by our conceptual framework. In making explicit our point of view, it plays many roles in the actual conduct of the study (see Appendix B). The conceptual framework also allows the reader to judge the extent to which he or she shares our point of view. Its two major components are an analysis of the goals of local implementation and a model of the context in which local implementation occurs. The first component provides the study with a benchmark against which to assess progress toward full implementation. The second component serves to define the domain within which we expect to find most of the useful (i.e., policy-relevant) explanations for why local implementation is proceeding one way rather than another.

Goals of Local Implementation

The first major component of our conceptual framework is an analysis of the goals of local implementation of PL 94-142. It was derived from a careful scrutiny of the pertinent sections of the law, including both legislative language and history and the applicable federal rules and regulations. As the law and regulations are written, the logical and practical relationships among the various requirements and goals are not always easy to discern. Hence, we needed to provide our study with an explicit description of the most important of these relationships.

Overriding Goals and Broad Implications

PL 94-142 includes two overriding goals that pertain to LEAs: the provision of a free appropriate public education (FAPE) to all handicapped children and the protection of the rights of handicapped children and their parents. From the perspective we adopted in this study, FAPE is a broad, overarching concept that subsumes the "procedural safeguards" concerned with placement in the least restrictive environment and with nondiscriminatory evaluation. In this view due process procedures (e.g., for parental notification and informed consent, and for due process hearings to resolve disputes between parents and the schools) serve the specific function of protecting the right of all handicapped children to FAPE.*

We presume that few, if any, LEAs presently operate so as to achieve the goal of providing FAPE to all handicapped children. Implementing the law, therefore, requires LEAs to bring about change in prevailing practices. By comparing the current operations of most local special education systems with the ideal system implicitly described in the law, we derived two fundamental action implications, or implementation goals, that LEAs should strive for:

- Increasing the scope and comprehensiveness of special education services.
- Changing current procedures so they result in individually appropriate services for children.

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* Requirements for placement in the least restrictive environment and for nondiscriminatory evaluation are classified differently in the regulations than in the law itself. In the regulations, the procedures concerned with placement in the least restrictive environment and with nondiscriminatory evaluation are classified, along with due process procedures, under the rubric "Procedural Safeguards" (subpart E). In the law itself, however, the section titled "Procedural Safeguards" (Section 615) covers due process procedures exclusively. In light of this classification difference between the law and the regulations, we felt free to decide for ourselves which one best suited our purposes. We reasoned that the key distinction is between that which is being protected (i.e., the FAPE rights that are being guaranteed by the law) and that which is doing the protecting (i.e., the due process procedures designed to back up the guarantee). Although evaluation procedures and placement procedures logically may be construed as belonging in either category, we opted to include them as integral components of the FAPE goal.

The first of these implementation goals requires LEAs to reach out and serve all children in need of special education services (i.e., to eliminate inappropriate exclusion from the system). It also encompasses an increase in the range and flexibility of services available to eligible children. This has merit in its own right and is based on the presumption that a wide, flexible range of services facilitates movement toward less restrictive placements. In short, LEAs must identify and serve all eligible children.

The second implementation goal requires changing traditional practices in specific and fundamental ways; this amounts to a paradigm shift in how schools decide what services each child receives. Traditionally, special education practices have rested on classification: a child is classified as having one or more handicapping conditions that then determine what services are to be delivered, by whom, and where. The intent of PL 94-142 is to alter this system fundamentally by shifting the focus of special education from categories of disabilities to individual children's needs. The law now requires that a child's unique needs be identified and that services appropriate to these needs be provided. Instead of fitting children to available programs, schools are now required to design an individually appropriate program for each child. The procedures specified to accomplish this goal necessitate basic, structural changes in how educational programming decisions are made. These basic, structural changes must be one of the fundamental implementation goals for LEAs.

The FAPE Schema

After visiting all of our sites during the planning phase of the study, it became apparent that, with rare exceptions, personnel attracted to special education are dedicated to providing an appropriate education for all handicapped children. It was also apparent, however, that individuals working in these 22 diverse LEAs met with greatly varying degrees of success in attaining the ideals of PL 94-142. Although it is always possible for exceptional individuals to achieve their own, different purposes in spite of a system that discourages them, it is far more common for the structure of an organization to shape and direct individuals' actions. Therefore, we decided it was most useful to study the degree to which goals were met in terms of how local special education systems operate, rather than in terms of the

behavior of individuals or the degree of their compliance with specific provisions of the law.*

Figure 1 is a schematic representation of what the law says about how an ideal special education system should operate under full implementation of PL 94-142. The schema omits the due process procedures, not because they are any less important than the FAPE provisions, but simply because, conceptually and graphically, it is unwieldy to depict both on the same diagram. Parents who have a complaint may invoke due process procedures with respect to virtually any matter shown in the FAPE schema. Thus the protection afforded by the due process requirements is intended to permeate the entire system rather than be localized anywhere that might be usefully depicted in the schema.

The FAPE schema explicitly represents the relationships among the mechanisms, values, and goals in PL 94-142 that characterize an ideal local special education system. By this we mean a school system that is set up to achieve the goal of providing FAPE to all handicapped children in its jurisdiction, and in which due process procedures are functioning effectively. Thus, the FAPE schema serves our study as a working definition of the intent of the law. The remainder of this section describes the elements of the FAPE schema in some detail, thereby introducing the reader to most of the specific requirements of the law with which our study was concerned.

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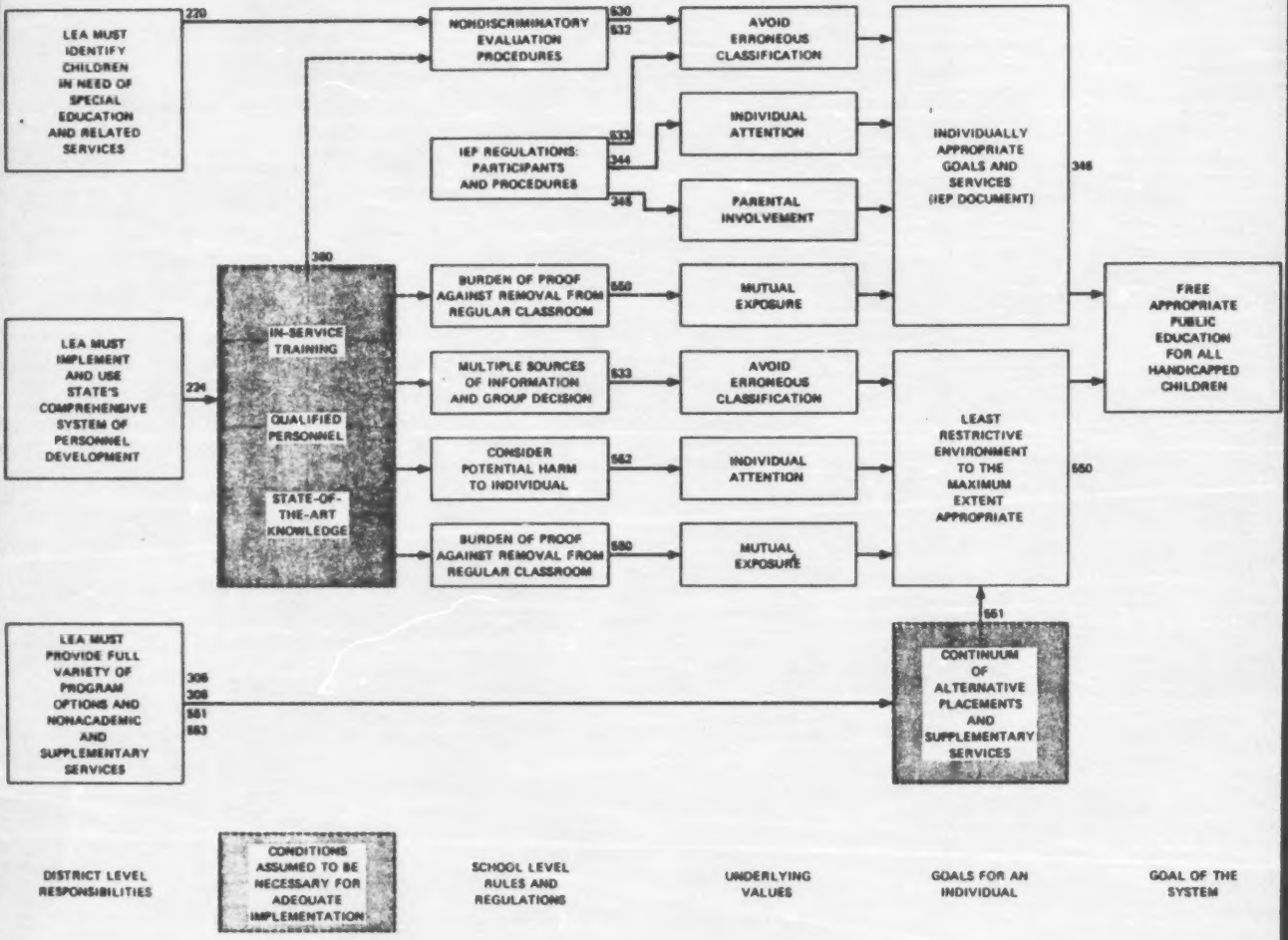
* The related decision, to conceptualize the spirit of the law in terms of a special education system operating in a manner compatible with the law's intent, effectively eliminated our need to address a host of questions dealing with individual motivation and blame. Thus, we were able to focus our attention where it was most likely to lead to policy-relevant observations: on incentives and disincentives, coping strategies, de facto priorities, and the practical difficulties of achieving the law's intent in organizations that were set up to operate differently.



NOTE: Numbers Near Boxes Refer to Regulations 121a.1 through 121a.754

FIGURE 1 STRUCTURE OF MECHANISMS, VALUES, AND GOALS IMPLICIT IN THE FEDERAL RULES AND REGULATIONS DESIGNED TO ACHIEVE THE FREE APPROPRIATE PUBLIC EDUCATION GOAL OF PL 94-142 AT THE LOCAL LEVEL

The ultimate goal of the system depicted in Figure 1 is to provide a free appropriate public education for all handicapped children. This requires that two complementary decisions be made about each handicapped child: What educational goals and services are individually appropriate for the particular child? and What is the least restrictive environment in which the child can be provided with the services appropriate to his/her needs?

Central to these decisions, and hence shown directly to their left in this schema, is a set of four basic values that can be inferred from a close reading of the legislative history of PL 94-142. Most crucial is the need for individual attention. Complementing this is the imperative of avoiding erroneous classification. Together, these two values constitute a fundamental shift in emphasis away from a system in which the assignment of a child to a category was the most significant event in the child's special education career. The third basic value is that of parental involvement. The final value derives from an awareness that both handicapped and nonhandicapped children benefit from the mutual exposure that "mainstreaming" provides.

Decisions about what is "appropriate" should result from treating the child individually, involving the child's parents, avoiding erroneous classification, and considering the benefits of mutual exposure. Decisions about what environment is least restrictive should result from a balancing act in which the "mainstreaming" goal of the law is reconciled with the child's best interest.

The law also includes specific requirements that should encourage the consideration of these basic values in the decisionmaking process. These requirements appear in the federal rules and regulations which are shown to the left of the boxes labeled "Underlying Values." In determining which services are most appropriate for the child, the key regulations concern IEP procedures, testing and evaluation procedures, and the need to justify removing a child from the regular classroom. To determine the least restrictive setting appropriate for the child, the salient regulations are those concerning multiple sources of information and multiple participants in decisionmaking, consideration of potential harm to the child and, again, the justification for removing a child from the regular class setting.

These requirements, and the values they promote, are considerations primarily dealt with by people at the school level (teachers, evaluators, principals) who work directly with the handicapped child. The role of the LEA administration in the law's implementation hierarchy is to provide the conditions necessary for school level personnel to carry out their functions as intended. These conditions are presented in the shaded boxes.

To choose a placement that is the least restrictive environment appropriate for the child, decisionmakers must have some range of placements available from which to select. Similarly,

placement, and services, and to permit the decisionmaking and service delivery mechanisms to operate as intended, the LEA must provide qualified personnel, in-service training, and the dissemination of "state-of-the-art" knowledge. Thus, the LEA is required to identify all children in need of special education and related services so that their individual needs can be determined. The LEA is also required to implement and use the state's comprehensive system of personnel development. Finally, the LEA must provide a full variety of program options and nonacademic and supplemental services in order to ensure that there is a continuum of alternative placements and supplementary services.

The main advantage of the FAPE schema is that it shows the relationships among the literal and implied requirements of the law and its regulations. It is not intended to describe what actually happens in a school or district; instead, it describes the considerations that ought to influence the way school systems refer, evaluate, place and provide services for handicapped children. If current practices in LEAs do not reflect these considerations, then the law intends that such practices change.

Context for Local Implementation

The second major component of our conceptual framework is a model of the context in which local implementation of PL 94-142 occurs. Because they are relevant to studying the implementation goals described in the preceding section, certain features and characteristics of public service bureaucracies in general and local special education systems in particular are described in this model. The law is designed to bring about some rather basic changes in how these systems operate; therefore, we have paid particular attention to the characteristics most likely to pose barriers to these changes.

Special Education Systems

Most local special education systems share three organizational characteristics that are likely to play a significant role in the implementation process: specialization of functions, division along the lines of different disabilities, and separation between the special and regular education systems. Although the structure of special education systems does differ from place to place, particularly as a function of the size of the administrative unit, these three characteristics are remarkably uniform.

Every special education system performs the same basic functions in the same basic sequence: students are identified and referred, evaluated, placed, and provided with services. In all but the smallest districts, different personnel are involved at different stages in this series of functions. Thus, to implement change (e.g., breaking down the historic tendency to provide services solely on the basis of a child's classification), the

effort must be coordinated so that each person in the process is working toward that goal. In a small district, this effort may amount to little more than the psychologist who is "in charge" of special education informally communicating a new concept to the appropriate people. In larger LEAs, however, assessment functions and service delivery functions are often performed by personnel reporting to entirely separate organizational entities, neither of which has a direct line relationship to other school level personnel. Specialization of function is at its greatest here: before a new concept can have significant impact at the school level, coordination must have begun at the highest level of the administrative ladder and been passed down step by step.

The traditional division along the lines of different disabilities is an even more fundamental obstacle for PL 94-142 implementation. For historical reasons, the typical special education system of today is literally designed to channel handicapped children into one of a fixed number of programs; the larger the system, the larger the organizational structure of each separate program. In its most extreme form, each organizational unit charged with the delivery of services for a particular disability may even have its own referral form and its own IEP format. Within such a system, the best efforts of an EMR (educable mentally retarded) coordinator to teach regular teachers to use a referral form may actually work at cross purposes to the efforts of an LD (learning disabilities) coordinator doing the same job. Clearly, it is difficult to implement goals that emphasize the individual in a system so firmly rooted in classification by type of disability.

The organizational boundary between regular and special education also has deep historical roots. Although districts vary among themselves, special education has always been "different," either subordinate to the regular education system or autonomous, but with a much more limited budget or line authority. This separation typically exacerbates the stigma often associated with handicapped children (and those who work with them) and limits the ability of special education administrators to effect changes in policy. Given the emphasis in PL 94-142 on "mainstreaming" and other desiderata related to coordination between regular and special education, this organizational boundary merits attention.

Public Service Bureaucracies

Local educational agencies share several features with other public service bureaucracies in which change has been studied. Police departments, welfare agencies, and school systems, among others, share certain characteristics that affect their capacity to change. One such feature is their public service orientation. Unlike organizations motivated primarily to maximize profits, public service bureaucracies are oriented toward satisfying their clients' needs for services; and client demand always expands to absorb all the services the system can deliver. A corollary is that problems literally never go away. Thus, a teacher could never meet all the individual needs of all her or his students, and at the same time meet the expectations of colleagues and superiors. Similarly, a district office can never meet all the legitimate needs of all the schools it serves and the agencies to which it is responsible. It follows that public service bureaucracies are chronically short of resources and are forced to compete for a limited share of them. Hence, their most basic need, adequate and reliable financial support, is dependent on politics and usually beyond their control.

This combination, unlimited demand and limited resources, means that individuals in public service bureaucracies inevitably develop coping strategies in order to make the necessary trade-offs. These strategies are not necessarily devised or implemented consciously, but they are inevitable. Examples abound: establishing priorities among programs to support or clients to be served, modifying goals, redefining or limiting clientele to be served, establishing routines to handle more individuals in less time, rationing services and, in general, exercising considerable discretion in day-to-day practice.

Finally, although mission-oriented, public service bureaucracies, as complex organizations, are also structured to maintain stability. Consisting of individuals whose role relationships are well defined, they do not change readily or by fiat. Hence, introducing fundamental change into a system like the public schools is bound to encounter some resistance and predictable problems.

The "Bottom-Up" Perspective

On the basis of our experience, the Rand study of educational change by Berman and McLaughlin (1978), and the hindsight afforded us by Weatherley's (1979) detailed study of the implementation of Chapter 766 (the special education law) in Massachusetts, we know that local contextual factors play a major role in shaping the specific nature of the inevitable trade-offs and coping strategies of both individuals and organizations. Weatherley provides many illustrations, such as the predictable tension between identifying and serving a larger number of children and providing more individualized attention for those

already in the system. A school principal, for example, must decide whether to spend numerous hours arranging an in-service training program to help all his regular teachers improve service to handicapped children in their classes or to spend those hours helping a teacher solve the problem of one child's needs for more appropriate services.

Along with the Weatherley and Lipsky (1977) "street level bureaucrat" model, we take the perspective that policy is being made (i.e., "implemented") by the behavior of the individual most closely in contact with the client. From this point of view, the higher federal and state administrative levels function as constraints on the range of options available to these local "policymakers." These constraints can be either facilitators or inhibitors when they are compared with some idealized standard of performance. For example, a state requirement that a psychologist use a particular battery of tests constitutes a constraint within which the psychologist has to operate in conducting an evaluation. If the requirement is consistent with the goals of PL 94-142, it facilitates progress toward implementation; if not, the requirement inhibits it. What this means is that individuals in public service bureaucracies are always being "squeezed" between constraints from above and demands from below. At any point on the administrative ladder there is always some level of the organization that is under pressure.

Our study of local implementation focuses on two levels of local special education systems: the administrative (district) level and the service delivery (school) level. In later sections of this report, we often use the term district to refer to various administrative level staffs; similarly, we refer to all service delivery personnel (e.g., psychological evaluator, resource teacher, principal) as school level. These two levels, with their respective contexts, are depicted in Figure 2.

The top half of the figure represents the administrative level. Assuming the administrative unit is a district office, the SEA at the top sends down regulations and money, monitors the district office, and provides technical assistance.* Immediately below are the schools, needing and demanding as much help from the district office as they can get. As an organization, the district office has certain attributes ("within-office factors") that may facilitate or inhibit its capacity to get things done. An unusually competent administrator can increase the capacity of this office to deal with its problems. If the administrator is the only district-wide special education person--as is the case in many small districts--then his or her capacity <u>is</u> the district office capability. In any case, we expect the office to be

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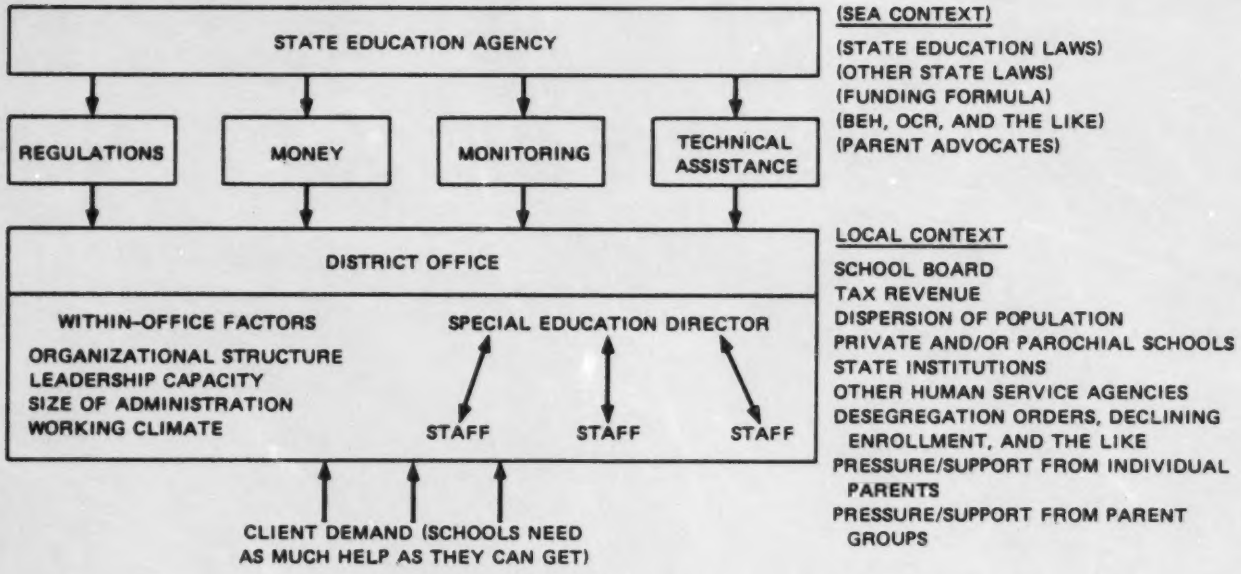
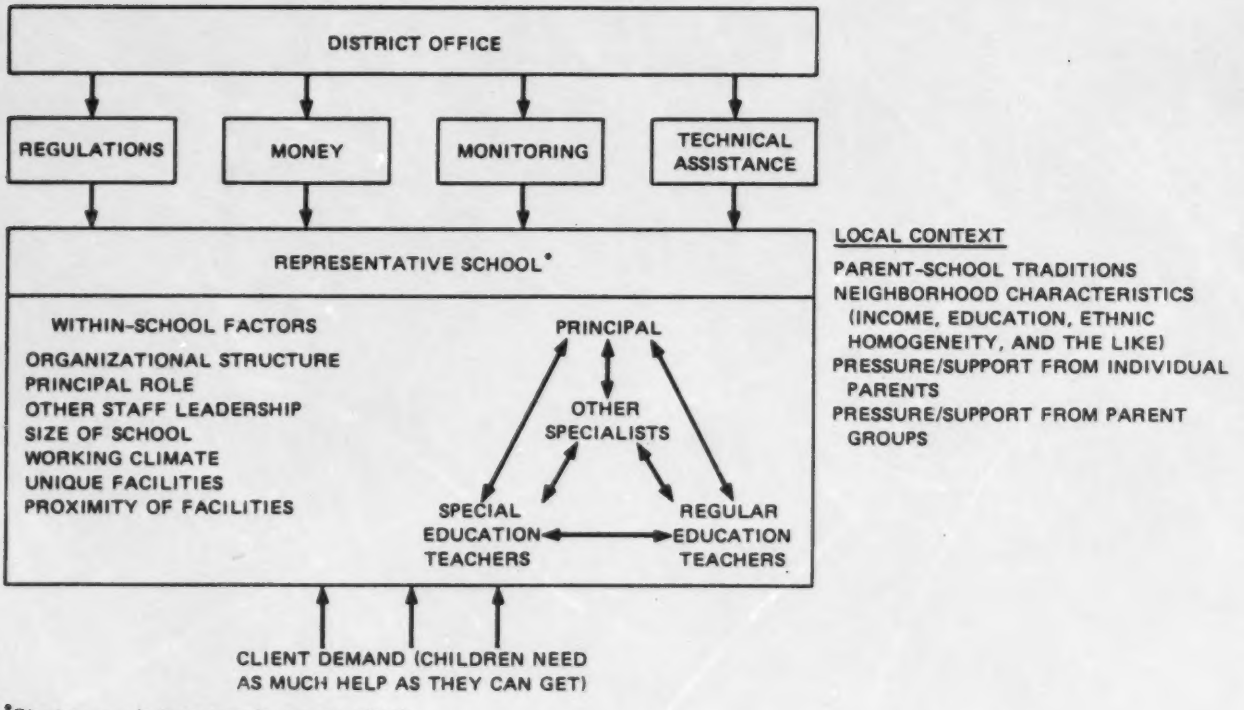
* The SEA itself is affected by its own context, of course, but we take this level into account in our study only to the extent that it has a direct effect at the LEA level.





*Districts vary in heterogeneity among schools.

FIGURE 2 MODEL OF IMPLEMENTATION CONTEXT

figuratively "bursting its seams" because of pressures from top and bottom. According to our view of discretionary strategies, the specific, concrete, day-to-day details of the local context will determine where the figurative "bulges" occur. Thus, for example, a district with little or no organized parent pressure will find it relatively easy to place a low priority on the parental involvement requirements of the law. On the other hand, a district with organized and vocal parent pressure cannot long avoid responding to the parent involvement requirements, despite the heavy commitment in time and personnel that this entails.

The bottom half of Figure 2 depicts the service delivery (school) level. At the top is the district office, representing both the helpful and restrictive constraints that act on the local school. Below are the children to be served. The quality of school personnel and leadership (and other "within-school factors") varies, as it does at the district level. Given the view that schools operate at or near their capacity, when they are caught up in the demands-resources squeeze, their priorities depend a great deal on the specific, concrete, day-to-day details of the immediate context. For example, when only one opening for a special program exists, one would expect that those with the loudest demands will likely be given the most attention. Of course, these demands may come from frustrated teachers as well as persistent parents. What our model suggests is that the relative volume of demands is related to such ("local context") factors as the economic and educational level of parents and the traditional parent-school relations in the neighborhood where the school is located.

In summary, our model of the implementation context adopts a "bottom up" perspective on implementation. To study the progress of implementation, we focus our attention on the structural features of local special education systems and on a few basic "facts of life" common to all public service bureaucracies. In doing so, we share the point of view of the individuals who deal most directly with handicapped children and their parents. These "street level bureaucrats," be they teachers or school-level administrators, are the individuals whose responses to the requirements of PL 94-142 determine whether or not the intent of the law is met. Their responses, in turn, reflect the circumstances of their daily lives, of which the federal law is only one factor. Thus, to understand local implementation, we must understand how the requirements of the law do or do not mesh with preexisting local practice.

The "bottom up" perspective relegates PL 94-142 to just one factor among many influencing the practice of special education. While this is an accurate view because the progress of implementation is, in fact, multiply determined, it minimizes our ability to attribute any particular fact or event to the law, per se. Instead of attempting to isolate the effect of the law by itself, we study the effect of the law in combination with preexisting state and local contextual factors. Because any change that

policymakers might institute in the law or regulations would also have to operate under this same combination of factors, this approach seems suited to provide policymakers with the most appropriate point of view.

This conceptual framework has continued to evolve over the first year of the study. As elaborated in the following chapter, our basic method of approach is iterative. For the conceptual framework, this approach means continued revision and refinement, such that, at any given point in our study, the current version incorporates and represents what we have learned about how best to think about local implementation of PL 94-142. In this sense, the conceptual framework is in itself an important product of our study.

Appendix B

METHOD OF APPROACH

Appendix B is taken from pages 23-50 of Local Implementation of PL 94-142: First Year Report of a Longitudinal Study, Marian S. Stearns, David Greene, and Jane L. David, 1980. In general, our method of approach has remained constant over the course of the longitudinal study. However, there have been two specific changes since the first year of data collection:

- We are now collecting data in 16, rather than 22, LEAs; in addition, we collect data only once during each school year. However, the sites visited still represent a wide variation in state and local characteristices.

- Our method of cross-site analysis has evolved since the first year of the study. As described on page B-26, during the first year of the study, it was difficult to retrieve information for cross-site analysis directly from the debriefings; we therefore generated "propositions," or potential findings, to which site visitors reacted. However, in the later years of the study, we modified our format for the debriefings, so that the debriefings could feed directly into the cross-site analyses.

Appendix B

METHOD OF APPROACH

Overview

In conceiving this study, OSE recognized the importance of delving into the underlying dynamics of local implementation. To best use its resources for this purpose, OSE's request for a longitudinal study specified a multiple case study design.

This design has obvious advantages for leading to policy-relevant insights. The open-ended, intensive style of case study research is ideally suited to investigating complex processes and discovering unexpected relationships that could elude a more structured, survey-type approach. Moreover, the main weakness of a case study--that it provides depth at the expense of breadth--is obviated when the results of many similar case studies can be compared and contrasted with each other. Nevertheless, all designs have their pitfalls; hence, to maximize the validity and generalizability of our findings, we infused our methods with precautions against the major pitfalls we could anticipate.

We knew that we could generalize relationships from our sample to a larger population only if the sample included a wide range of variation on important explanatory factors.* Thus, in selecting our sample, we designed procedures to ensure that our 22 sites varied considerably on the factors then deemed most likely to explain differences in local implementation. After three visits to each site, our staff were able to develop a more informed list of factors on which it was essential there be variation in order to protect against invalid inferences. We were then able to confirm that our sample selection procedures had indeed accomplished this purpose.

In conducting the individual case studies, we designed procedures to ensure that we obtained multiple perspectives, asked relevant questions, and avoided premature closure. These procedures minimized the danger that our site-by-site findings would be trivial or unnecessarily contaminated by respondent or interviewer bias. Also, in performing cross-site analyses, we adopted an inductive logic of disconfirming or qualifying propositions rather than a deductive logic of testing hypotheses. This approach, among its other virtues, enabled us to avoid the loss of interesting and important findings that appeared in only a few sites or in different forms in different sites.

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* We discuss the subject of generalizability at greater length on page B-8 ("Variation on Important Factors").

Finally, our methods included the validating step of peer and practitioner review of our findings. By circulating our draft report among a score of critics with a wide variety of perspectives, we assured ourselves that our inbred limitations had not produced a phantom picture of reality. Ultimately, of course, any longitudinal study also benefits from the opportunity to make improvements over time on the basis of continuing feedback. The rest of this Overview section introduces two orienting concepts that illustrate how this works in our study.

Cycles of Data Collection and Analysis

The iterative, cyclical nature of our study is illustrated in Figure 3. Each year of the longitudinal study includes two cycles of data collection and analysis. Each cycle begins with the current conceptual framework, which represents our current understanding of how best to think about local implementation of PL 94-142. In the fall of 1978 in particular we had the benefit, not only of our prior knowledge and experience, but also of what we had learned from site visits conducted during the planning phase of this study. As described in more detail in subsequent sections, the conceptual framework provides the starting point for generating a working list of topics to pursue on site (the "debriefing format") and criteria for site visitors to use in selecting respondents with whom to schedule interviews. It is also the source of more general concepts that provide some of the content of site visitor training. After this training, the cycle continues with the site visits themselves, individual site analyses, and cross-site analyses. As illustrated in Figure 3, decisions made during earlier stages in the cycle may be modified as dictated by experience during later stages. Finally, the results of data analyses feedback into the conceptual framework, where the next cycle will begin.

There are two different ways in which our knowledge grows with each cycle of the study. First, we describe changes in the status of special education in our sites that take place over time on specific topics of interest (e.g., uses of IEPs or the range of currently available services). To the extent that the same topics remain of interest over time, these descriptions of changes in status are analogous to traditional longitudinal data.

Second, with each cycle of the study we increase our ability to judge what feature of each topic is most important to pursue

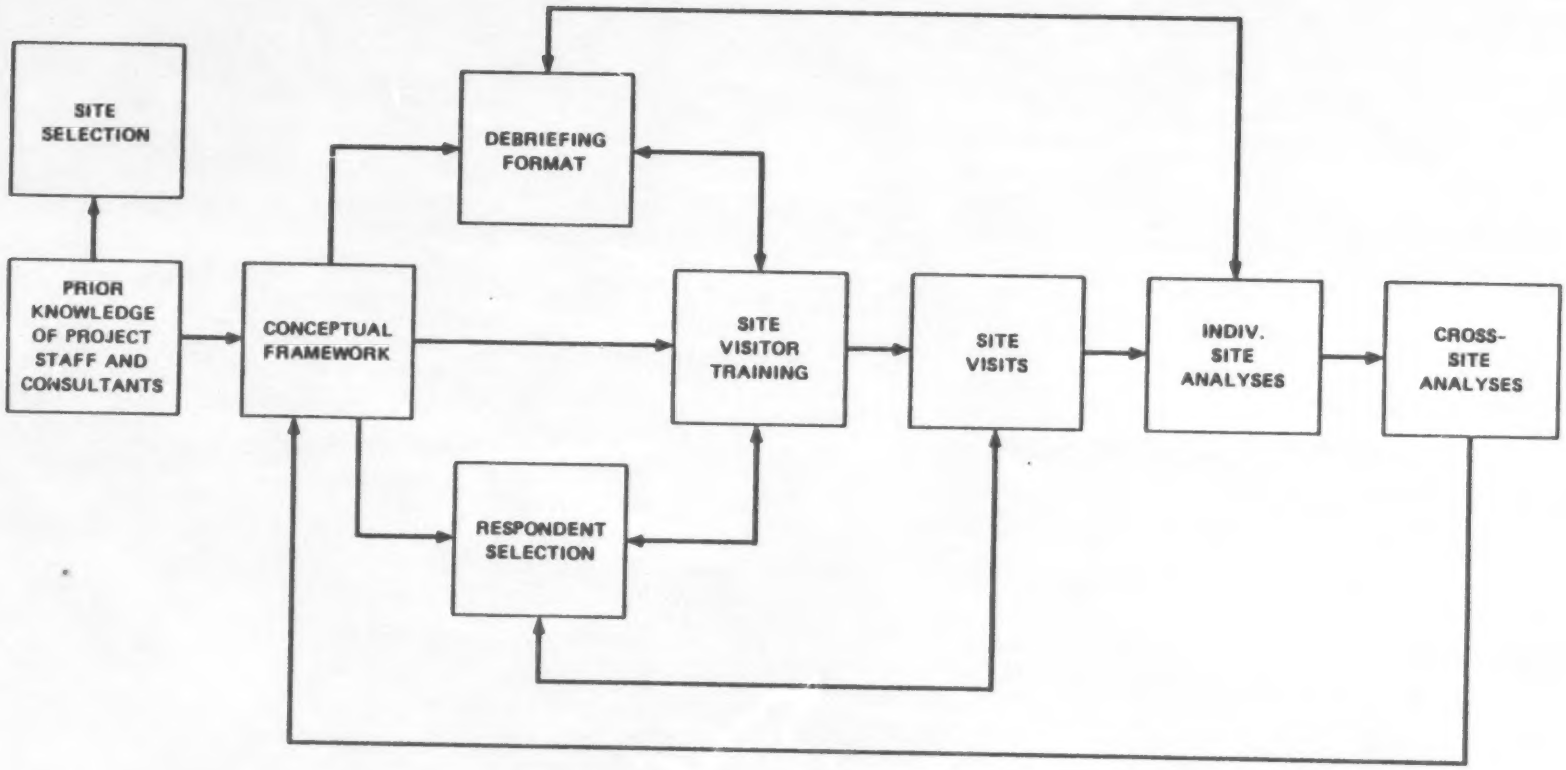

FIGURE 3 OVERVIEW OF METHOD OF APPROACH

effort must be coordinated so that each person in the process is working toward that goal. In a small district, this effort may amount to little more than the psychologist who is "in charge" of special education informally communicating a new concept to the appropriate people. In larger LEAs, however, assessment functions and service delivery functions are often performed by personnel reporting to entirely separate organizational entities, neither of which has a direct line relationship to other school level personnel. Specialization of function is at its greatest here: before a new concept can have significant impact at the school level, coordination must have begun at the highest level of the administrative ladder and been passed down step by step.

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The organizational boundary between regular and special education also has deep historical roots. Although districts vary among themselves, special education has always been "different," either subordinate to the regular education system or autonomous, but with a much more limited budget or line authority. This separation typically exacerbates the stigma often associated with handicapped children (and those who work with them) and limits the ability of special education administrators to effect changes in policy. Given the emphasis in PL 94-142 on "mainstreaming" and other desiderata related to coordination between regular and special education, this organizational boundary merits attention.

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* Children with specific learning disabilities (SLD) are included as handicapped under PL 94-142. Because the abbreviation LD is more commonly used in practice, we use it, rather than SLD.

The initial selection of sites is the only stage of the study that does not reflect its iterative nature, because the sample (or a portion of it) is kept constant for longitudinal comparisons (Figure 3). The following section describes the method by which we selected our sample and provides evidence of the variation within the sample on important explanatory factors. Subsequent sections describe our data collection and analysis procedures.

Sample Selection

The goal of sample selection was to choose a number of sites small enough to study intensively and yet varied enough to support generalizations to a larger population. To accomplish the former, we limited the number of sites to 22. To accomplish the latter, we selected factors that we believed would be most likely to explain differences in local responses to PL 94-142 and that could be ascertained, at least grossly, in advance. We then devised procedures that would ensure maximum variation on these factors among the LEAs in our sample.

Selecting States

The purpose of selecting states was to maximize the likelihood of obtaining relevant variations among the LEAs in the resulting sample. To ensure this variation, we began by selecting states that represented the continuum on the match between existing state special education laws and PL 94-142. We presumed that the extent to which states had enacted requirements similar to PL 94-142 before its passage would strongly influence the responses of their LEAs to the new requirements. Hence, we used state level measures of policies similar to PL 94-142 as a proxy for the extent to which LEAs in the state would have had a head start in implementing the new law.

To measure the match between state laws and policies and PL 94-142, we first used information from the review of state laws and regulations conducted by the National Association of State Directors of Special Education (NASDSE). In keeping with the philosophy of our study, we also interviewed persons with firsthand knowledge of state practices. These included NASDSE staff and BEH state plan officers. This enabled us to sort states into three categories--low, middle and high--according to how closely their state policies matched the major provisions of PL 94-142 (individualized education programs, parent involvement, a variety of placement settings, and allowances for least restrictive placements).

To select the states in which LEAs would be chosen, we held a conference in Washington, D.C., attended by SRI staff, OSE officials, and NASDSE staff. During the meeting we sought comments on the results of these classifications. At the suggestion of

the participants, two other state level factors were added to our selection criteria: state funding formulas for special education and the state system of organization for special education. Based on these criteria and the comments of the conference participants, we chose nine states that represented substantial variation on the factors: California, Florida, Illinois, Mississippi, Oklahoma, Pennsylvania, Rhode Island, Tennessee, and Washington.

Selecting LEAs

LEAs in these states were selected so as to maximize variation on local factors that we expected would influence responses to PL 94-142. We presumed that the availability and accessibility of resources would strongly affect local special education practices. We defined availability of resources as the amount of local funding, facilities, qualified staff, administrative leadership, and community involvement. We defined accessibility of resources in terms of geographic size and population dispersal. We also wanted to ensure variety on other potentially significant influences such as the presence of residential institutions, collaborative relationships with other districts, state-supported special schools, and separate buildings for special education.

To obtain information on these factors and nominations for LEAs to be included for study, we spoke with the state directors of special education and other state level personnel in all nine states. During these conversations we described both the purposes of the study and our definitions of the factors on which we wanted variation. The former was necessary in order to communicate that the success of the study rested on our ability to see problems as well as solutions; hence, we pointed out that the study would fail if only exemplary LEAs were nominated. Because the factors were essentially clusters of variables and not individually measurable, we also spent considerable time explaining what we meant by resources and the type of variation we were seeking. The nominations we received reflected our criteria and covered a range of districts from each of the nine states. From these recommendations, we chose two or three LEAs from each state, primarily to ensure variation across the entire group of them and on the basis of logistical concerns. This resulted in a sample of 22 LEAs (Figure 4).

Variation on Important Factors

Before looking at the evidence that shows we achieved requisite variation in our sample, we should consider how this evidence is related to the generalizability of our findings. We are particularly concerned about the generalizability of the underlying reasons or explanations for local responses to PL 94-142 that we infer from the data in our sample. To be useful to policymakers, these explanations must be generalizable to a larger

FIGURE 4 FIELD SITES FOR THE LONGITUDINAL IMPLEMENTATION STUDY OF PL 94-142.

population than the 22 LEAs we visited. Because the requirements for generalizability are an extension of the requirements for validity, we begin with a discussion of the latter.

A reason or explanation is valid only to the extent that (1) it is plausible in its own right and (2) we believe that all relevant alternatives have been adequately considered and rejected.* Thus, one cannot prove that an explanation is valid; one can only persuade by argument or by appeal to another's experience that both these criteria have been met. At a minimum, such persuasion requires that the explanation be derived from a sample containing the factors generally believed to be likely explanatory factors. To make a case for validity, one should maximize the variation on as many of these factors as possible. This is because the more a factor varies within a sample, the more reliably its relative importance can be judged. To be even more persuasive, it should be possible to argue that no reasonable candidate explanatory factor has been excluded from the sample.

The criteria for valid inference call attention to the relative importance and relative exhaustiveness of the explanatory factors included in the sample, not merely how much these factors vary. Including all the relevant explanatory factors is necessary to allow the possibility of valid inference; the higher the variation on these factors, the higher the likelihood that valid inference will be achieved in practice.**

An explanation is generalizable from a sample to a larger population only to the extent that (1) it meets the criteria for validity within the sample and (2) we believe that the explanation would appear equally valid if it were tested, by the same criteria, against the data in any other sample comparably drawn

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* This is the crux of all inductive inference. Researchers vary in their abilities to think of relevant alternative explanations, to collect and use data skillfully to test them, and to persuade their audiences that they have done an adequate job. Similarly, the multiple audiences for and stakeholders in research efforts vary in both the sophistication and the neutrality with which they make judgments about the adequacy of these efforts. Hence, reasonable people sometimes disagree about whether a particular research finding meets the criteria for a valid explanation.

** For purposes of this discussion, we assume that the validity of inductive inference is not limited by inadequacies in the analysis of the data provided by the sample. (Our procedures for data analysis are described in a separate section later in this appendix.)

from the larger population.* Thus, the specific criterion for generalizability from a sample is the belief that all the important explanatory factors in the larger population are adequately represented in the sample. Again, the more variation there is on these factors, the more confidence we have that they adequately represent the larger population.

Assessing the adequacy of our sampling choices was a major goal of the preliminary site visits during the Spring 1978 planning phase of our study. Although the site selection factors themselves are not directly measurable (see "Selecting LEAs," above), interviews and documents collected on site provided numerous facts and figures about resource availability and accessibility. State laws and regulations also provided relevant information to confirm the expert advice we had accepted in the process of selecting states. When we used this kind of information to assess the variability in our sample, we were satisfied that it met any reasonable expectations.

After the Spring 1979 site visits, we were in a position to see whether differences in implementation were associated with differences in the kinds of factors we had used to select our sites. With a full year's formal data collection behind us, the staff held a series of meetings to reach some consensus on the set of factors to include in a "site factor matrix." The main criterion for including a factor in the matrix was the same as it had been for choosing the factors that provided the basis for sample selection: the belief that it exercises a significant influence on local PL 94-142 implementation. We also limited the set to the kinds of factors that could be stated and defined so as to apply, as least in principle, to all 22 LEAs.** The main difference was that this time our judgments were based on what we had each learned from interviewing respondents with multiple perspectives in several LEAs.

Tables 1 and 2 present these state and local level factors and their definitions. After a year's experience in the field, these are the 11 explanatory factors that we judged collectively to be most important in accounting for differences among LEAs in

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* In the case of statistical inference, this belief is justified within known limits to the extent that certain assumptions about the population are true and certain procedures for sample selection are followed.

** At individual sites other factors (e.g., local politics) were often, if not always, equally or even more important influences on PL 94-142 implementation. Moreover, the chosen factors so often act in combination with each other that their individual effect at an individual site may be essentially impossible to determine.

TABLE 1

STATE LEVEL FACTORS AFFECTING LOCAL PL 94-142 IMPLEMENTATION

FACTORS AND HOW THEY WERE DEFINED	DISTRIBUTION OF STATES IN OUR SAMPLE		
	+	Neither	-
TRADITION: State special education law as of 1977-1978; plus if progressive, facilitates; minus if regressive, inhibits.	6	2	1
FINANCIAL SUPPORT: As perceived by locals during 1978-1979; plus if abundant, praised; minus if meager, acute problem.	2	6	1
ADMINISTRATIVE LEADERSHIP: As perceived by locals; plus if helpful; minus if detrimental.	2	2	5
MONITORING: As perceived by locals; plus if helpful; minus if detrimental.	1	7	1
ELIGIBILITY CRITERIA: With regard to individualization of services; plus if reasonably flexible; minus if unreasonably rigid.	1	7	1

TABLE 2

LOCAL LEVEL FACTORS AFFECTING LOCAL PL 94-142 IMPLEMENTATION

FACTORS AND HOW THEY WERE DEFINED	DISTRIBUTION OF LEAS IN OUR SAMPLE		
	+	Neither	-
TRADITION: Relative to general education, as of 1977-78; plus if good support in the past; minus if poor support in the past (even if getting better now).	13	5	4
RESOURCES: Relative wealth and political clout within the state; plus if facilitates implementation relative to other LEAs; minus if inhibits implementation relative to other LEAs.	7	8	7
ADMINISTRATIVE LEADERSHIP: Plus if facilitates relative to other LEAs; minus if inhibits relative to other LEAs within the state.	13	7	2
SIZE OF ADMINISTRATION: Of special education; plus if small or simple, minus if large or complex enough to require attention in its own right.	9	5	8
DISPERSION/COMMUNITY STRUCTURE: Plus if urban, industrialized, densely populated, many low-incidence handicapping conditions; minus if rural, not industrialized, sparsely populated, few low-incidence handicapping conditions.	6*	9**	7
PARENT PRESSURE: Plus if heavy pressure for services, high expectations relative to resources, parents are organized; minus if passivity, need to reach out, expectations are met by present services.	3	8	11

*One also high dispersion.
**Includes three suburbs and one small town.

their implementation of PL 94-142. These factors are quite similar to, albeit more proximal and differentiated than, the factors on which our sites were originally selected. We invite our readers to compare this set of factors with their own experiences.

Tables 1 and 2 also provide the opportunity to look at the variation in our sample on these factors. A few comments may be helpful in interpreting the entries in the tables. The "neither" column was used for two different purposes: to indicate an "in between" point on the scale and to indicate that the scale could not be meaningfully applied to a given state or LEA. Because three of the five state-level criteria were defined from the LEA perspective, it was common for a state to be judged "neither" when different LEAs saw the same SEA from conflicting perspectives. This was particularly the case for monitoring, which should be no surprise to our readers. It also appears that our sample overrepresents progressive states and progressive LEAs or that we came to view more of our sites in these terms after we had visited them. Notwithstanding this tendency in the tables, the data reinforce our conviction that the sample meets the "bottom line" criterion for generalizability of explanations: no cell is empty.

Because the data reflect judgments that our respondents made in confidence, we do not disclose which states and LEAs belong in particular categories. Unfortunately, this constraint results in tables that present a very conservative picture of the variation in our sample. To convey more accurately the extent to which our 22 LEAs represent a variety of combinations of explanatory factors, we present the following capsule descriptions of each site's characteristics.

California

- Butte County is a consortium of 15 school districts in a rural mountain area in northern California. The consortium serves 22,100 students of whom 1,600 are in special education. The consortium was formed to prepare to meet the full educational opportunity/free appropriate public education requirements of PL 94-142 and the California Master Plan for Special Education. Chico State University lies within the county and trains special education personnel.
- Fresno Unified School District is the sixth largest district in California, serving approximately 3,332 exceptional students. Two colleges within the county provide special education teacher preparation. The economy is largely dependent on agribusiness, with a large minority population. Although ranking low on income, the district ranks high on expenditures for instruction. A desegregation plan and the California

Master Plan for Special Education are being implemented simultaneously with PL 94-142.

- San Diego Unified School District is the 11th largest district in the United States, in a city with a large senior citizen population, a large naval base, and two large universities. The special education department is made up of a complex administrative structure that encompasses 5 divisions and 18 different subdepartments. The school district is implementing a court-ordered desegregation plan and has been accepted into the California Master Plan, while in addition adjusting to cutbacks from the passage of the Jarvis-Gann property tax reduction initiative.

Florida

- Hillsborough County's public schools are consolidated into a single school district which is the 22nd largest in the United States, serving approximately 11,500 handicapped students. Tampa, the county seat, is the regional financial, service, and distribution center for Florida's west coast. A large minority population is present in the county, and there are two universities that provide trained special education personnel to the schools. LEAs in Florida exhibit a great deal of independence as do principals within LEAs through the adoption of a school-based management system.

- Okeechobee is a poor, rural county in southern Florida whose main industry is agriculture. There is a large Spanish-speaking, Indian, and migratory population within the county. Like all LEAs within Florida, the Okeechobee School District is a county system and serves a highly dispersed population of 4,300 students of whom slightly over 10% are in special education. Because of its rural location, access to and attraction of resources has been limited.

Illinois

- Lee County Joint Agreement is a special education cooperative located in rural northcentral Illinois that was formed in 1967 when it was mandated that Illinois schools provide special education for all children, ages 3-21, by 1969. The joint agreement includes all of Lee County and two or three districts from surrounding counties, and serves 17% of the school-aged population in special education. One of the largest employers is the residential state mental health facility located in Dixon with an estimated 400 school-aged children to be served.

- Northern Suburban Special Education District (NSSED) is a joint agreement of 23 member school districts on Lake Michigan to the north of Chicago that is composed of a series of affluent, politically astute, suburban communities. NSSED, which has been in existence since 1960, serves approximately 5,000 handicapped children in a total school population of 47,000.

Mississippi

- Itawamba is a rural county in northeastern Mississippi whose main industry is agriculture. The dispersed population of 3,700 students is served by 7 schools in the district. The special education program was instituted in 1973 and serves 181 students. The program is supplemented by close cooperation with the SEA and state-directed Area Learning Resource Center.
- Pascagoula Independent School District is located in Jackson County, one of the most affluent in Mississippi, due to an economy based on light and heavy industry. The population is diverse, including Indians and Vietnamese who have settled in the area and who are supportive of school programs. Two nearby universities provide the district with technical assistance as well as teaching personnel. The school district serves approximately 9,000 students of whom between 625 and 675 are in special education.

Oklahoma

- Guthrie is a generally low-income, rural community located in central Oklahoma whose population is largely made up of migrant and retired individuals and small-factory workers. The Guthrie School District serves 2,700 to 3,000 students in grades K-12, of whom 222 are served by special education. Limited local funds have hindered the availability of resources and made the district largely dependent on state and federal support.
- Tulsa is the second largest city in Oklahoma; its major employers are the aerospace and aviation industries. The Tulsa School District serves approximately 60,000 children located in 4 counties covering almost 140 square miles. The parents and advocacy groups within the community are strong and active. Qualified staff are an accessible resource and there are two nearby state schools to serve the severely handicapped (Oklahoma law prohibits paying for services in private schools).

Pennsylvania

- Bucks County Intermediate Unit consists of 13 school districts located in a suburban area north of Philadelphia. Intermediate units replaced the county school operations in the early 1970s and are responsible for the support services for all school districts under their jurisdiction. An estimated 12,000 exceptional children in Bucks County are served by public schools, a number of private schools, a private licensed facility, and a state school and hospital.
- Central Susquehanna Intermediate Unit (CSIU) encompasses 17 school districts within a 5-county rural region of central Pennsylvania. The CSIU provides approximately 68% of all programs and services to the region's 4,000 handicapped students and is responsible for the educational programs at 2 state institutions.
- Philadelphia School District is its own intermediate unit, organized into 8 sub-districts, and has a public school population of approximately 153,000 students of whom 20,000 are in special education. Of the state's 44 approved private schools for the handicapped, 33 are in the Philadelphia area and the parochial school system is almost as large as that of the public.

Rhode Island

- Coventry is a middle-class community, considered to be a suburb of Providence, and covers a fairly large geographical area. Of its approximately 5,500 students, between 380 and 420 are identified as having some handicapping condition. Due to its proximity to Providence and the small size of the state, the district has access to a variety of state-supported and private facilities.
- Woonsocket is a manufacturing town whose population has a strong French background. The Woonsocket Public School District consists of approximately 9,700 students and serves about 900 handicapped children. The special education budget is largely subsidized by the state and, because the town is fairly near to the capital, it has access to a variety of state-supported and private facilities.

Tennessee

- Campbell County is situated just south of the Kentucky border in northeast Tennessee and covers about 600 square miles of rural Appalachia. The area is the largest coal producing district in Tennessee and people living in the outlying areas of the county lead a very rural lifestyle.

The school district covers seven towns, and special education serves approximately 17% of the 7,000 school-aged children. Campbell County is part of a four-county cooperative that provides many general services, and the state provides technical assistance and compliance monitoring through regional offices.

- Memphis, noted as an educational and medical center, is a large urban area located in the southwest corner of Tennessee. Two large universities and a number of colleges provide the school district with trained personnel. The Memphis City School System serves 125,000 students in 126 schools, including 16,600 handicapped students. The private school population has increased since the institution of court-ordered busing.
- Nashville is the second largest city in Tennessee, the home of country music and the state's capital. Within the Nashville area there are several major colleges and universities that the school district uses as a source for staff development, program innovations, and personnel recruitment. Advocacy groups are very active and were instrumental in getting legislation, based on the Council for Exceptional Children model, enacted in the state. The Metropolitan Public Schools serve approximately 76,000 students, of whom about 11,000 or 14% are handicapped.

Washington

- Edmonds School District is located in Snohomish County and is considered a suburb of Seattle. The major employers are Boeing Aircraft and the school district; the economic make-up of the district is diverse, ranging from upper to lower income families. Edmonds is the fourth largest school district in the state with a pupil enrollment of 23,500. Special education programs serve approximately 1,500 students and include a separate facility for the severely handicapped. Several universities in the Seattle area provide trained personnel to the school district.
- Longview, Washington, is located on the Columbia River. The sound economic base of the city has made the Longview school system the second wealthiest in the state of Washington. The total enrollment is 8,052, with special education pupils making up 241 of that number.
- Yakima is located in southcentral Washington in the fertile Yakima Valley whose economy is based on agriculture. The West Valley School District is one of three in Yakima proper. The district is small and rural, with a school population of 3,315 students that includes 230 students served by special education.

Data Collection

During the 1978-79 school year, we collected data during two 2-4 day visits to each of our sites, one in the fall and one in the spring. Each visit was conducted by two members of our core staff. Site visitors spent most of their time conducting interviews and collecting forms and documents to supplement interview notes. (They also attended meetings and observed ongoing programs when these could be arranged.) Following each visit, the primary site visitor wrote a case study report. The rest of this section describes our data collection procedures more specifically.

Debriefing

Each cycle of data collection begins with a set of decisions about what topics to pursue and in what depth to pursue them. To ensure that the data collection results in information that is comparable across sites for the cross-site analyses, we developed what we call a "debriefing" format.* It serves both as a guide for the site visitor in collecting data and as the actual format for writing up field notes after a site visit is completed. The debriefing format focuses the site visitor's attention on a common set of topics yet, depending upon the particular circumstances of each site, also allows the site visitor the freedom and flexibility to decide how and to what extent those topics are pursued.

The debriefing format is derived from the current conceptual framework (see Appendix A) and reflects the emphasis of the particular site visit. For example, during the 1978-79 school year the fall site visits focused on school level personnel; much of the debriefing format was therefore devoted to events that occur at the school level, such as referrals and IEP meetings. In contrast, the spring site visits focused on events at the district or IU office, relations with groups outside the school (such as parent advocacy organizations), and interagency coordination.

Before each site visit, a new debriefing format is developed by the core analysis staff.** It lists the topics to be covered

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* To keep this report of tolerable length, we are not supplying examples of our materials in the appendix. We will be happy to supply them to interested colleagues upon request.

** Unlike what occurs in much case study research, the size of our staff permits some specialization of functions between site visitors (n=5) and those whose primary responsibilities are design and cross-site analysis (n=3).

during the site visit, is structured as an outline, and is written at a level sufficiently general to allow for differences among sites. For example,

> Describe the nature of the LEA's most satisfactory relationship with another public service agency. Include the reasons why it is "most satisfactory," whether there are formal as well as informal agreements, and whether there is state or higher level local support for the relationship.

The draft debriefing format is circulated among the site visitors to determine if all the topics are clear, whether they will be interpreted in the same way, and whether important ones have been omitted. At the same time, a draft of the criteria for respondent selection is circulated. Both of these drafts are then revised as necessary to reflect site visitors' reactions and concerns.

An expanded version of the debriefing format allows for one or more pages of writing space in response to each item. Upon returning from a site visit, it takes a site visitor from 1 to 3 weeks to prepare a complete debriefing. When complete, the debriefing is the recorded descriptive analysis/case study report of a given site for a given visit. All the debriefings for a given site are its case history.

Site Visitor Training

Training site visitors has two primary purposes. First, it ensures that they have a shared understanding, along with the analysis staff, of the conceptual framework, the debriefing format, and the manner in which various topics are to be pursued on the upcoming visit.* This aspect of training is one way we attempt to maximize reliability. The second purpose is to teach the site visitors specific skills to maximize the validity of the data they collect (primarily from interviews).

For the data to be comparable across sites and across site visitors, it is essential that the site visitors view the study's purposes and conceptual grounding in the same way. For this to happen, the site visitors must be immersed in the development of the concepts on which the study is based and the ways in which these abstractions are translated into data collection procedures and topics. Immersion cannot occur in a one-shot training session; therefore, the training for this purpose is ongoing, as

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* The site visitors' backgrounds are varied, each having begun this study with experience or training in field-based educational research, teaching, and/or special education.

exemplified by site visitor involvement in the final versions of the debriefing format and criteria for respondent selection. This aspect of training has both formal and informal components. The site visitors are involved in each phase of the study, from meetings to explain iterations in the conceptual framework to participation in all stages of data analysis. The fact that the same visitors remain with the study from year to year means that the impact of this immersion/training is cumulative.

Training for the purpose of imparting specific data collection skills, although grounded in the shared understanding described above, is more formal in its procedures. Validity of the data must be assured; to accomplish this goal, we rely on fairly traditional methods such as "cross-examination" and triangulation. Through simulation exercises with volunteer parents and school personnel from districts in the vicinity of SRI, for example, site visitors learn to probe respondents, asking the same question in different ways, and pursuing topics both directly and indirectly to test relevance and consistency. They are also trained to draw inferences systematically on the basis of multiple sources of data. This so-called "triangulating" among respondents and other evidence sources is an important skill in obtaining an accurate rendition of a particular event--where accuracy is defined as "the common understanding of an event that avoids the biases of a single respondent." Finally, the site visitor training emphasizes that, when appropriate, they verify their perceptions immediately by paraphrasing a respondent's answer and requesting the respondent to acknowledge mutual understanding. Thus, site visitors are trained to be concerned with establishing validity through "structural corroboration" (Guba, 1978), ". . . a process of gathering data or information and using it to establish links that eventually create a whole that is supported by the bits of evidence that constitute the whole. Evidence is structurally corroborative when pieces of evidence validate each other" (Eisner, 1979, p. 215).

In addition to these two purposes, formal training sessions provide an opportunity for the staff to read and discuss relevant literature and to strengthen their knowledge of the law and regulations. These sessions occur in the last few days before the wave of site visits is scheduled to begin. Meanwhile, to prepare for their upcoming trips, the site visitors have been engaged in other activities besides this training.

Selecting Respondents

It remains for the site visitor, in preparation for each site visit, to perform the complex task of selecting the actual respondents and setting up the interview schedule with his or her site liaison. As described earlier, the topics to be covered during a given site visit are specified in the debriefing format. Also derived from the conceptual framework are criteria for selecting respondents to be interviewed on the specified topics.

These criteria may be in the nature of a role description (e.g., "a director of special education"), or they may specify something about the kind of information needed (e.g., "a parent who can present a balanced point of view"). The site visitor's decisions are based on his or her unique combination of knowledge of the topics to be pursued and the particulars of the site known from previous visits. Within the common guidelines, the site visitor determines which types of respondents are needed and makes specific choices based on the quality of information received from particular individuals in the past and on accessibility and other logistical concerns.

Where choices of respondents require sampling decisions to be made (e.g., among districts in an intermediate unit or among schools in a district), our approach is modeled after the logic and spirit of our strategy for selecting the original sample of sites. In making these decisions as well as less subtle ones, the ability of the site visitor to contact knowledgeable individuals on site by telephone in advance of the visit is crucial to making the best choices. Thus, an important aspect of the site visitor's role is to maintain good relationships with key contacts in the LEA. To underscore how important we view these relationships, we have established a policy of sending a project newsletter to our sites in advance of each visit.

After an interview schedule has been developed, the site visitor continues preparation for the visit by specifically tailoring the debriefing format to the particulars of the given site. This preparation involves reviewing past debriefings to determine what further information will now be sought from particular respondents. The results of these various preparatory activities is an open-ended interview guideline, annotated to prompt the site visitor not to overlook certain questions.

"Rotating" Site Visitor

Each visit itself is conducted by a two-person team. The (permanent) site visitor is accompanied by a member of the analysis staff (or perhaps another regular site visitor) in the role of "rotating" site visitor. The advantages of having the same person return for every visit are obvious: familiarity with people on site greatly increases trust and gives the site visitor greater access to more accurate and detailed information. The advantages of our rotating site visitor strategy merit some explanation.

From the case study point of view, the rotating site visitor contributes to improving both reliability and validity. As a classic reliability check, the rotating site visitor provides partially independent confirmation of the permanent site visitor's perceptions and interpretations. In addition, whatever biases the permanent site visitor may bring as a result of his or

her continuing relationship with people on site are at least different from those of the rotating site visitor. Moreover, the rotating site visitor has knowledge of other sites unfamiliar to the permanent site visitor and, by providing a new perspective during the visit, may be able to prompt the permanent site visitor to generate fresh hypotheses. This directly contributes to the validity of our findings. Finally, a two-person team can divide the tasks of asking questions and taking notes between themselves in order to do both as well as possible. This produces comprehensive field notes with many direct quotations.

From the cross-site analysis point of view, it is crucial that members of the analysis staff be able to visit as many different sites as possible. A rotating site visitor can interpret events at one site as instances of more general patterns. Conversely, what appears to be one kind of problem when interpreted in the context of one site may appear entirely different when contrasted with another site. (For example, the difference that an excellent administrator can make may be overlooked by someone who has never seen one in operation.) This subject is discussed at greater length in the following section.

Apart from what we have described to this point, what actually happens on site visits varies as much as the sites themselves. Last year, the visits were usually 2 or 3 days in duration, but ranged from 1 to 4, depending on the site visitors' judgments of the time necessary to do their jobs adequately. In the fall, when we focused on school level personnel, we interviewed as few as 10 and as many as 22 repondents per visit. Spring visits typically involved fewer respondents. Most visits begin with a courtesy call to the administrator who is the key site contact. In spite of best efforts to plan a schedule of interviews, it is not unusual for site visitors to have to do a lot of reshuffling once they arrive.

The one commonality worth mentioning is a conscious effort to schedule interviews in a "bottom-up" sequence. For example, where feasible, site visitors interview teachers before interviewing principals, principals before district administrators, and district administrators before school superintendents. This sequence is most consistent with the explanatory model in our conceptual framework. It allows the site visitor to construct or follow a trail of explanations to the limits of the scope of our study. It also has the advantage of giving the site visitor some substance with which to motivate an interview with a "higher up" in the system.

Data Analysis

This section is divided into two parts. The first part describes procedures and methodological concerns in the preparation of individual case study reports ("debriefings"). The

second part describes procedures and considerations in performing cross-site analyses on our data.

Individual Case Studies

With few exceptions, our data are qualitative. Before being analyzed by the permanent site visitor, the data consist primarily of interview notes. Whatever forms and documents that have been collected on site are usually mere supplements to these notes, in the sense that their availability makes it possible to focus interview time on questions that cannot be answered by reference to the documents.

The format for data reduction is the debriefing format, which we described above (see "Debriefing"). The site visitor responds to each item in this format with prose that may range from a sentence or two to several typed pages. Responses vary in depth and subtlety, and particularly in the thoroughness with which each topic is treated at different sites. Each response describes some event or activity and, according to the approach dictated by our conceptual framework, embeds these descriptions in their local context. To illustrate the flavor of these responses, here is a sample from an actual report:

> Private schools became an issue when district officials tried to bring back into district-sponsored programs all children (mostly LH [learning handicapped]) that they had formerly placed in private schools. The district felt that . . . they now had the programs to serve these children. According to the special ed personnel, the transition was being accepted by parents during conferences at which the district assured parents that their child could go back to the private school if things didn't work out in the public program. Then a representative from the private school association came on the scene and, as a result of his persuasion, many parents decided they would oppose the change back to public school placements through fair hearings (the private schools provided the resources).

This particular example also illustrates the general point that explanations are often conveyed most effectively by stories or quotations.

The essence of these case study reports is their context-dependency. The original version of the first debriefing format began with a section called "background," which was intended to be a cursory, mainly historical description of the site's characteristics. As the structure of the debriefing formats evolved in use, this section became a "preamble." Simply, this evolution reflects the degree to which site visitors feel the necessity of

providing a less cursory context for their responses to individual items. The best debriefings are filled with cross-references among items, because the format has forced the writer to break a complexly interconnected story into discrete units.

To transform raw interview notes into discrete responses to specific items, the site visitor must reorganize the notes from a "by-respondent" structure to a "by-topic" structure. In doing so, the principal mental activity of the site visitor is selection. Each visit confronts the site visitor with a potentially bewildering array of possibly significant facts and explanations. The process of selection begins with the planning for the visit, continues throughout the interviews, and characterizes every decision that goes into the case study report. Between the guidelines of the conceptual framework and the techniques of establishing structural corroboration, the site visitor must eliminate the insignificant and fix on what emerges as salient and important. This process is imperfect; it is too subjective for many researchers' taste; it relies on intuition and judgment. Nevertheless, given the experience of our staff and appropriate training, the process works. It produces fascinating descriptions and explanations of what is going on at individual sites.

The principal methodological issue in these case studies concerns the degree of certainty one can have about a characterization based on a limited number of respondents. This concern is one of the most significant trade-offs we have to make between depth, which implies spending more time at each site, and breadth, which implies a greater number of sites than can be investigated optimally. Of necessity, we adopted a policy of pragmatism about depth of evidence. When two sources contradict each other and no other relevant evidence exists, we always say so. Otherwise, our guidelines for writing debriefings advise site visitors to use language precisely to convey the basis for any uncertainty. This policy might have serious drawbacks if our approach to cross-site analysis were more conventional. Given the approach we adopted, however, the actual degree of uncertainty in individual case studies is more than tolerable.

Cross-Site Analysis

In performing cross-site analysis, we had several objectives that could only be met by data from a variety of sites with diverse characteristics. One important objective was to provide summary descriptions of those aspects of local implementation that are reasonably uniform across sites. Examples of such findings are that all LEAs have IEP procedures in place and that they tend to make placement decisions on the basis of openings in available programs.

Another important objective was to describe differences in implementation from site to site and to attempt to explain these differences in implementation by identifying other differences

among sites with which they are associated. One example of this kind of finding is that LEAs in states whose regulations conflict with federal regulations are having a more difficult time with implementation than LEAs in states whose regulations do not conflict. This example is one that we anticipated in our site selection strategy. Another example is that LEAs with "boundary crossing" school-based personnel, such as resource teachers, are having more success with "mainstreaming" than LEAs without such personnel. This example emerged from our analyses.

An additional objective of the cross-site analyses was to test the generality of explanations for events at individual sites that appeared to provide support for our conceptual framework. For example, we were told at one site that informal meetings for the purpose of establishing priorities among referrals were necessary because there was no other way to keep from overloading the system's capacity to evaluate children within legal timelines. This explanation, of course, fit our conceptual framework perfectly. The relevant questions for cross-site analysis were the overall prevalence of such "prescreening" meetings and the extent to which their presence or absence is related to a perceived limit of the system to handle unprioritized referrals.

Thus, the purpose of cross-site analyses was to make inferences across sites about LEAs in general. Analyses were performed to test the extent to which statements of findings could be supported across all our sites, or could be associated with certain characteristics explaining differences among LEAs.

As a result of our approach to the individual case studies, the debriefings contained descriptions and explanations that relied heavily on details of each site's local context. For some of the goals of our cross-site analyses, retrieving the relevant information directly from the debriefings (e.g., whether notification and consent procedures are in place) was quite straightforward. For other purposes (e.g., testing inferences about connections between timelines and prescreening mechanisms), it was impossible. In many cases, directly retrieving relevant information from the debriefings was logically possible but logistically difficult and inefficient. Accordingly, we decided we could accomplish all our goals most efficiently with an approach that made more direct use of the field notes and knowledge of the site visitors and less direct use of the debriefings themselves.*

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* We also decided to capitalize on our iterative approach by modifying our individual site case report procedures for next year by shaping them more specifically to feed into our anticipated cross-site analyses.

The approach to cross-site analysis we adopted recapitulates the logic of an individual case study. Each of the 22 individual sites in our study is treated as a "respondent," in the person of the site visitor permanently assigned to that site. The topics of interest are constrained by the six BEH evaluation questions, our concern for policy relevance, and our conceptual framework. Procedures are designed to ensure that a wide variety of hypotheses are generated and that the most reasonable and interesting of them are tested against the data. Finally, the findings are selected and organized with the goal of highlighting and exemplifying important themes and patterns. The remainder of this section describes the procedures in more detail.

The first step in our cross-site analysis was to generate a file of potential findings. Each member of the staff was asked to generate an unstructured list of statements that he or she "would like to see in the final report." These statements were written on file cards. The heuristic suggested to site visitors, who were in the process of completing their debriefings, was to think of interesting findings at their sites and then write them as if they were true at more than one site. Members of the analysis staff who had been to several sites as rotating site visitors tended to write statements on a more general or abstract plane than permanent site visitors. Statements were made in varying degrees of detail and abstraction by everyone who participated in this activity. Here are two examples drawn arbitrarily from the original file:

> Schools feel pretty confident that they have taken specific and adequate steps to inform parents of their rights. They typically say they provide something in writing and present the information verbally.
>
> Although teachers spend a lot of time doing IEPs, they don't find them all that useful on a daily basis.

We were aware that our biases were not independent, and therefore built into the procedure an exhaustiveness heuristic. We compiled a list of sources for statements in addition to ourselves (e.g., BEH documents, periodic newsletters, notes from staff meetings over the previous year), and then systematically went through these sources and wrote statements from them. By the time our file had grown to over 1500 cards, we were convinced that we were not omitting anything important.

The next steps began the first wave of selecting and organizing the potential findings. A major effort was devoted to sorting the cards according to categories developed in a tentative final report outline. After the cards had been through this gross sort, a member of the analysis team took each category and broke it down into subtopics, each of which could be discussed in a paragraph or two. At this stage, duplicates were removed and

very similar statements were clipped together. This sort reduced the total number of cards to fewer than 1,000.

At this point, members of the core analysis staff went through the file and flagged those statements that were relatively general and abstract (i.e., stated in a manner more like cross-site findings than like individual-site findings). The cards that represented specific instances of more general statements were removed and filed for later reference. We made certain that we included all the points we wanted to make (if they were supported by data). From that time on, we continued to work with only this subset (about 250) of the cards.

Our next sorting was done according to the type of statement on the card. A distinction was made among assumptions, findings, and conclusions, though some overlap was tolerated. This sort separated the assumptions or conclusions from the findings. From within the findings, the more specific statements were grouped under the related, but more inclusive, general statements. This sort narrowed our file to about 30 categories of cards, each category corresponding in one way or another to a set of findings (e.g., IEP meetings, "mainstreaming," due process hearings).

The next step was to format these 30 sets of cards into an outline of the findings in a final report. The analysis staff worked "from both ends" to converge on this format. At one end we worked with the set of cards in a spatial array, which we moved around to represent relative distances, conceptually, among topics. At the other end, we took into account our sense of the information needs of the various audiences for the final report. The result of this exercise was a new emergent outline that became, in fact, the working outline for the findings chapters of this report.

To summarize, at this point in our cross-site analysis we had produced a set of a few hundred statements that were organized according to a possible final report outline. If all of these statements were unequivocally true, the findings chapters essentially would have been written. Of course, the veracity and generality of these statements remained to be tested.

The next step in our cross-site analysis was to produce a "draft list of propositions for site visitor review." Unlike the statements that served as input to this step, the propositions were carefully worded to constitute an integrated whole. Under each of 21 headings (e.g., "eligibility and identification," "in-service training"), propositions were listed in sequences intended to convey an organized presentation of a finding. Within each sequence, an attempt was made to break down the structure of an argument into component statements. Following are two examples of simple propositions:

3.c. Regular classroom teachers express a need or desire for more useful training in how to make referrals.

16.a. The greatest impact of the law at the school level has been to add new duties to old ones.

These propositions were written for the specific purpose of systematically eliciting carefully structured responses from the site visitors. Accompanying the 33-page list of propositions were two pages of instructions and two different response formats. Site visitors responded for each of their sites independently. For each proposition, the basic response format asked for any "qualifications, examples, and quotations" that the site visitor wanted to offer.* In practice, site visitors were encouraged to use the "comments" column to indicate explicitly the sense in which a given proposition did or did not apply to each site.

Several points about this exercise bear emphasis. First, there was some presumption that the propositions were generally true but needed to be qualified appropriately. Everyone understood that the purpose of the exercise was to produce a report of findings in which words would be used as precisely as possible to convey the conditions under which the propositions were true and the conditions under which they were not true. As a result, site visitors were encouraged to disagree with the implied generality of a proposition by explaining precisely how a given site was an exception. In addition, they were free to use the "don't know" response category and often did so, particularly when they were uncertain as to whether the evidence from a site was solid. This response option protected us against making inferences across sites that relied on shaky data from an individual site. Moreover, many of the propositions made reference to conditions that did not hold at all sites (e.g., due process hearings). In these cases, the appropriate response was "doesn't apply," which was often accompanied by a description of the reason. The same response format was used to elicit relevant examples and quotations, which were typically drawn directly from the debriefings. Thus, an important function served by the exercise was to make the writing of the final report a truly collaborative enterprise. Not only did site visitors' responses determine which propositions remained unchanged, they also provided cases in point, exceptions, and the specifics of qualifications.

After site visitor responses had been given to all the propositions, the analysis staff was in a position analogous to that of the site visitor writing a debriefing. For each of 21 topics, the "data collection" stage of the cross-site analysis procedure had produced 22 sets of responses to be integrated.

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* The other response format, rarely used, invited site visitors to restate the proposition however they wished.

Qualifications to the propositions had come in many guises. At this point, the analysis consisted of deep immersion in the data on a topic-by-topic basis. Our actual procedure involved assigning a member of the analysis staff to study site visitor responses to a particular topic, and then to draft a summary of the qualifications to the propositions necessitated by the site visitor responses. Working with these notes, and sets of examples and quotations from the debriefings, we were able to write each section of the findings chapters.

When all site visitor responses were yes or no, or there were one or two clear exceptions, it was relatively easy to generate descriptive text from the propositions. When responses were divided, we referred to our "site factor matrix" to see if the division could be explained by characteristics of sites similar to our original site selection factors (see Tables 1 and 2 and accompanying text, above). We also looked for new explanatory factors that emerged from the analysis (e.g., the previously mentioned presence or absence of resource teacher types). When we failed to make sense out of the pattern of responses, we rejected the proposition as useless or decided to pursue the issue next year rather than attempt to report on it prematurely.

By adopting an inductive approach to cross-site analysis, we freed ourselves from the necessity to use every site to test every proposition. Instead, we limited our search for generalizable explanations to the subset of sites that provided both relevant and reliable data on a particular matter. Thus, different sites were used for different purposes, as appropriate. This approach enabled us to avoid the loss of interesting and important findings that appeared in only a few sites or in different forms in different sites.